

Representations on FBC090 Revised Housing Supply Topic Paper			
Name of respondent	Specific paragraph (if any)	Issues Raised	Council Response
Anne Brierly	Appendix B	In FBC064 HA4 housing allocation, the build number reads as, a TOTAL of 315 for years 2023 – 2028. Given its net number is 350. When are the other being built? In housing supply Topic paper APPENDIX B page 17 HA4 over the same five years has increased to 350 dwellings with 2024 - 2025 increasing from 15 to 50.	The 15 for 2024/2025 in FBC064 is a typo and should have read 50. However, FBC064 is not the subject of this consultation and the figure for HA4 is correct in FBC090 Housing Supply Topic Paper.
		Too much reliance on Welborne. Overly optimistic delivery assumptions.	Significant progress has been made on Welborne since the hearings and the site promoter and master developer, Buckland Development Limited, have provided evidence on to support the delivery rate assumptions.
Buckland (David Lock Associates)		Significant progress on Welborne since the hearings. Whilst it is acknowledged that there has been some delay in the submission of residential reserved matters applications, this will not constitute a delay of a full year, but more likely 3-6 months. Consider that 150 occupations in 2024/25 would be a more accurate reflection of the current delivery programme. Buckland remain committed to an ambitious delivery rate at Welborne. Would consider that an upper limit of 200-250 dwellings per year, is likely. This delivery rate has been reduced to reflect the requirement for 10% affordable housing in the early phases. If Buckland were able to increase the proportion of affordable housing in these	Comments noted. Whilst the Council acknowledge a reduced peak delivery rate, no evidence has been provided to support this lower figure. It is considered that the upper limit of 250 homes per annum is deliverable given the proposed approach to multiple house builders on plots and phases throughout the development and the Inspector's conclusion that 260 homes a year was a reasonable assumption. Therefore, it is considered that the latter years of delivery could be revised to 250 homes per year. The Council also agree that a six-month delay is more appropriate and agree that 150 homes are deliverable in 2024/25. The trajectory can be amended to reflect these changes.

		early phases, the overall delivery rate would increase accordingly.	
Hammond, Miller and Bargate (Pegasus Group)		Contingency buffer is not sufficient.	Whilst the contingency buffer has reduced to 7.1%, the Council is confident that this is sufficient particularly given the greater certainty over permitted sites, including Welborne, that has developed in recent years. There is no policy requirement to have a contingency over the housing requirement and as the delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings, the Council disagrees that 7.1% is insufficient and appropriate in the circumstances.
		The stepped approach of the Council acts to unnecessarily and unsustainably constrain meeting the needs of households in the early years of the Plan, which further compounds the substantial backlog in housing delivery (including affordable housing delivery). The principal reason the Council proposes a very low delivery rate in the early years is simply to pass the HDT.	The proposed stepped housing requirement ensures that the Council meets its own housing need over the lifetime of the plan. The first 'step' as proposed is shorter than in the submitted plan, only applying to the first two years of the plan period. The proposed approach ensures that under delivery is addressed as soon as possible in a planned approach and that projected completions are above the minimum housing need for the vast majority of the plan period. The Council does not consider that a stepped requirement will constrain development coming forward, as evidenced in the trajectory, and in particular, identifying further sites will not increase delivery between 2022 and 2024.
		Adjusting the stepped trajectory in order to pass the HDT and therefore avoid the presumption in favour of sustainable development is not sound.	Paragraph 15 of the NPPF states that 'the planning system should be genuinely plan led'. Therefore, it would be inappropriate to progress a Local Plan to adoption only for the policies which are most important for determining planning applications to be out of date on the basis of poor HDT results for reasons outside of the Council's control. This approach is consistent with the NPPF and sound.
		Five-year housing land supply position is marginal with the Council unable to	The NPPF only requires plans to secure a five-year housing land supply upon adoption, not a rolling five-year

		demonstrate a 5-year housing land supply from 2027/28 onwards. Additional sites should be allocated to ensure continuation of supply across the Plan Period as required by the NPPF.	<p>supply over the plan period (paragraph 68a) and this plan complies with this requirement. The supply across the plan period meets the need. The Council agrees that a rolling 5YHLS of greater than five years would give greater comfort of a plan-led approach. However, there are other factors to take into account. First, plans have to be reviewed every five years and a predicted lack of five-year supply might be a trigger for future review. This is clearly a matter that the Council will keep under close review. Additionally, the Government has signalled the removal of this requirement where plans are in place and up to date. This second factor is another reason why the plan is likely to be reviewed within five years to ensure the continuation of a five-year supply.</p> <p>Regarding the early review of the plan, the Council has considered the relevant criteria in Regulation 5, and do not consider that it is appropriate to include a policy in the Local Plan which commits the council to a further review (see FBC072, and indeed INSP015 which supports this view). In addition, Local Plans are required to be reviewed every 5 years.</p>
		Over-inflated housing supply - 3 homes at 68 Titchfield Park Road (HA38) which has planning permission for the conversion of a 6-bed care homes (which equates to the loss of 3 homes) to 9 homes	Agreed. The supply position can be amended to reflect this minor change.
		Over-inflated housing supply - 1 home at Phase 1, 69 Botley Road (HA17) which has planning permission for 12 homes following the demolition of the existing dwelling,	Agreed. The supply position can be amended to reflect this minor change.
		Over-inflated housing supply - 1 home at 195-205 Segensworth Road (HA47) which has planning permission	Agreed. The supply position can be amended to reflect this minor change.

		for 8 homes and the demolition of 1 dwelling.	
		Over-inflated housing supply - 3 homes at Hammond Industrial Estate (HA31) which has planning permission for a 68-bed care home (which equates to 36 homes) and the demolition of 3 homes.	Agreed. The supply position can be amended to reflect this minor change.
		Over-inflated housing supply - 22 homes at Land east of Brook Lane, Warsash (HA1) which is subject to RM applications for 118 rather than 140 homes.	Disagree. This change occurred after the base date of the Local Plan supply and therefore no change is required
		Over-inflated housing supply - 20 homes at Land adjacent 125 Greenaway Lane (HA1) which is subject to an RM application for 80 rather than 100 homes (P/21/1780/RM).	Disagree. This application is under consideration and not yet decided. This change occurred after the base date of the Local Plan supply and therefore no change is required
		Over-inflated housing supply - 1 home at Land at 18 Titchfield Park Road which has outline planning permission for the erection of 6 homes and the demolition of 1 home;	Agreed. The supply position can be amended to reflect this minor change.
		Over-inflated housing supply - 7 homes at Land south of Longfield Avenue (HA55) which is subject to an outline planning application for 1,200 homes and an 80-bed care home (which equates to 43 homes) rather than 1,250 homes.	Disagree. This application is under consideration and not yet decided. This change occurred after the base date of the Local Plan supply and therefore no change is required
		A number of sites such as Heath Road (HA9) and Robann Park (HA3), which benefit from a resolution to grant outline planning permission but no application or the approval of reserved matters, and yet the Council suggest that these sites will deliver homes within a year.	Disagree. The Council has evidence (FBC064) from the promoters of both these sites of their intention to proceed with delivery of the sites within timescales anticipated. This was discussed with the Inspector during the Hearing sessions.

		<p>Welborne (LP3) which has been further delayed, still does not benefit from a residential application for the approval of reserved matters and requires significant upfront infrastructure works, and yet the Council assume that the first completions will be achieved within 2 years.</p>	<p>The site promoter and master developer, Buckland Development Limited, has provided evidence suggesting that a 12-month delay is excessive and a six month delay is a more accurate reflection of the delay with 150 homes delivered in 2023/24 (instead of 30 homes in FBC090).</p>
		<p>The trajectory only allows for an unrealistic 10% non-implementation rate on small, permitted sites and unrealistically assumes that every dwelling on every large site will be delivered.</p>	<p>Whilst the revised Housing Supply Topic Paper is a new document, there has been no change to the approach towards the non-implementation of permissions from the submission plan.</p> <p>The 10% non-implementation rate on small sites is higher than the Council's monitoring indicates is the actual rate for lapsed permissions on small sites. In terms of larger sites, the contingency buffer is in place in the event that sites do not come forward as expected. Furthermore, the delivery assumptions on large sites are based on engagement with site promoters and landowners, and therefore there is a greater degree of certainty compared to small sites. This was examined through the Hearing sessions with the Inspector.</p>
		<p>Council has not provided any evidence in support of the contribution from any of the Category B sites as required by the NPPF. As such the 5-year housing land position is materially lower than proposed by the Council. The Revised Housing Supply Topic Paper includes a supply of 2,282 homes over the period 2022-27 from proposed allocations and other sites with outline planning permission and without evidence these should be discounted from five-year housing land supply calculations.</p>	<p>The deliverability of the proposed allocations (both category A and B) was thoroughly tested during the Local Plan examination hearings.</p>

Persimmon Homes (Gillings Planning)	Paragraph 2.2	The bulleted list omits Land east of Crofton Cemetery and west of Peak Lane (Site HA54) where planning permission was granted on appeal for 206 dwellings in January 2022. This represented an addition of 26 dwellings over and above the 180 homes identified as the site's capacity in Policy HA54 of the local plan	The list in paragraph 2.2 is a list of <i>additional</i> large sites since the supply position was published. The site Mr Home is referring to was already included in the supply, albeit it at 180 homes and not the 206 homes which was eventually granted on appeal. The trajectory in the topic paper had already been updated to reflect the planning permission accordingly (see page 15). Amendment to para 2.2 not considered necessary.
	Paragraph 2.7	Contingency buffer has reduced to 7.1%. Paragraph 4.12 of the plan acknowledges that the Planning Inspectorate recommends a minimum contingency buffer of 10% additional supply. It is considered that the erosion of this buffer, to a level well below 10%, demonstrates the need to identify additional deliverable new sites to address the gap. In the absence of appropriate additional sites, essential for the local plan to commit (through policy) to an early review to be completed within five years.	<p>Whilst the contingency buffer has reduced to 7.1%, the Council is confident that this is sufficient particularly given the greater certainty over permitted sites, including Welborne, that has developed in recent years. There is no policy requirement to have a contingency over the housing requirement and as the delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings, the Council disagrees that 7.1% is insufficient.</p> <p>Regarding the early review of the plan, the Council has considered the relevant criteria in Regulation 5, and do not consider that it is appropriate to include a policy in the Local Plan which commits the council to a further review (see FBC072). In addition, Local Plans are required to be reviewed every 5 years.</p>
	Section 3.0	Consider proposed changes to the stepped housing trajectory a welcome improvement to the position set out in the plan as Submitted. But important that the stepped trajectory is not seen as a mechanism to suppress housing delivery in the early years of the plan or to set a maximum number of homes for any given year. A clear statement in policy that the annual average figures set out in the stepped trajectory do not	Comments noted. The Council's belief in a plan-led system means that it is illogical to progress a Local Plan to adoption only for the policies which are most important for determining planning applications to be out of date on the basis of poor HDT results for reasons outside of the Council's control.

		represent a 'maximum' is justified and necessary.	
	Table 4	Error in Table 4. The stated 'Local Plan Housing Requirement' for years 2022/3 – 2026/7 should be 2,822 and not 2,882 as stated (653 x4 + 210). However, we believe that the correct figure has been used in the calculation in the subsequent rows, so this error should not impact the outcomes.	Agree that this is a typo. However, the correct figure of 2,822 has been used in the calculation and so the error does not impact the outcomes.
	Table 4	The 'Under Delivery' row is not correctly allocated as the 69-dwelling shortfall from year 2021/22 should be addressed within the first five-year period only. This means that the full 69 should be included for the 2022/3 – 2026/7 column, and the shortfalls in subsequent 5-year blocks adjusted accordingly.	Comments noted. This was an error and the trajectory can be amended accordingly. However, the change makes no appreciable difference to the five year supply position.
	Section 5.0	Concern that the rolling 5YHLS position for the first five-year period is projected to be marginal at best, in spite the proposed changes to the stepped housing trajectory. Also, the 5YHLS will become inadequate in by year 6. It would take very little for this position to deteriorate and put the Borough in a position where there was an inadequate housing land supply. This position further emphasises the need for the clear policy-based commitment to an early review of the local plan.	<p>The Council does not disagree that a rolling 5YHLS of greater than five years would give greater comfort of a plan-led approach, there are other factors to take into account. First, plans have to be reviewed every five years and a predicted lack of five-year supply might be a trigger for future review. This is clearly a matter that the Council will keep under close review. Additionally, the Government has signalled the removal of this requirement where plans are in place and up to date. This second factor is another reason why the plan is likely to be reviewed within five years to ensure the continuation of a five-year supply. Moreover, the NPPF only requires plans to secure a five-year housing land supply upon adoption, not a rolling five-year supply over the plan period (paragraph 68a).</p> <p>Regarding the early review of the plan, the Council has considered the relevant criteria in Regulation 5, and do</p>

			not consider that it is appropriate to include a policy in the Local Plan which commits the council to a further review (see FBC072). In addition, Local Plans are required to be reviewed every 5 years.
Miller Homes (Terence O'Rourke)		MH had concerns regarding the trajectory for Welborne. Agrees with the Inspector's position on this and are pleased to see that the site's trajectory has been pushed back a year and the peak delivery rates reduced to a more realistic figure	Comments noted.
		Contingency buffer is not sufficient.	<p>Whilst the contingency buffer has reduced to 7.1%, the Council is confident that this is sufficient particularly given the greater certainty over permitted sites, including Welborne, that has developed in recent years. There is no policy requirement to have a contingency over the housing requirement and as the delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings, the Council disagrees that 7.1% is insufficient.</p> <p>The Housing Supply Topic Paper clearly demonstrates that the total Local Plan housing supply is in excess of the housing requirement, and therefore a contingency buffer exists.</p>
		Adjustments in the housing supply affect the Council's ability to meet the flat or stepped trajectory. The stepped approach to housing land supply, whilst allowed for by the NPPF and PPG in some cases, is not sufficiently justified and is inconsistent with the NPPF in Fareham. Limiting provision to later in the plan period and continuing to suppress housing delivery to a greater extent than the submitted stepped requirement in the very early years, will leave a whole generation	<p>The proposed stepped housing requirement ensures that the Council meets its own housing need over the lifetime of the plan. The first 'step' as proposed is shorter than in the submitted plan, only applying to the first two years of the plan period. The proposed approach ensures that under delivery is addressed as soon as possible and that projected completions are above the minimum housing need for the vast majority of the plan period.</p> <p>Identifying further sites will not increase delivery between 2022 and 2024.</p>

		without sufficient housing. Specifically, FBC will produce a housing deficit for the first seven years of the plan period with a deficit of over 500 dwellings between 2022 and 2024.	
		Adjustments in the housing supply effect the 5-year housing land supply, which has significantly decreased. If there is slippage in delivery (including for example in the process of approving reserved matters applications) the position will quickly become marginal or fall into a negative/shortfall position. In order to ensure FBC meet the need and secure a rolling five-year supply, avoiding the need for a stepped housing requirement, it is now even more imperative that additional deliverable and developable sites should be allocated	<p>The Council does not disagree that a rolling 5YHLS of greater than five years would give greater comfort of a plan-led approach, there are other factors to take into account. First, plans have to be reviewed every five years and a predicted lack of five-year supply might be a trigger for future review. This is clearly a matter that the Council will keep under close review. Additionally, the Government has signalled the removal of this requirement where plans are in place and up to date. This second factor is another reason why the plan is likely to be reviewed within five years to ensure the continuation of a five-year supply.</p> <p>The housing supply identified in the plan meets the housing requirement and therefore the Council do not consider it necessary to identify further sites.</p>
		There is a clear and serious question mark, which goes to the soundness of the plan, over whether the contingency actually exists and, if it does, whether it is effective and whether a positive approach has been taken. the reality is that the contingency buffer is not a contingency at all, but a relied upon element of the planned supply	The Housing Supply Topic Paper clearly demonstrates that the total Local Plan housing supply is in excess of the housing requirement, and therefore a contingency buffer exists. There is no requirement for a contingency buffer of a particular size. The plan meets the housing requirement as well as identifying sites for additional homes should some sites not deliver as anticipated. Therefore, it is to be expected that the contingency forms part of the planned supply.
		The revised topic paper confirms that the 20% buffer is only applied for the first two years (down from three years) due to expected HDT results with 5% buffer applied from then on. The PPG states that	The Council considers this response to be a mis-reading of the data. Table 4 shows the rolling five year position, as per the column headings. The 20% buffer would apply to requirement in the first two five year periods but as

		the buffer should be applied to the requirement in the first 5 years and there is no reason that FBC shouldn't comply with this.	soon as the Council receives an HDT result over 85% this would revert to a 5% buffer.
		The revised proposed stepped approach to housing delivery continues to be inconsistent with the NPPF and unjustified given the additional sustainable sites available	This consultation is not considering omission sites.
Shaun Cunningham		Questions whether Welborne will achieve projected build out rates and meet promises on infrastructure in a timely manner and live up to the design challenges. The Council and Welborne developers have never been realistic in their approach to a timeline. Entering a time of financial uncertainty which will have an impact. No mention of Welborne and the difficulties that remain to be overcome and yet Welborne remains core to achieving the Council's 5-year land supply. Welborne should be reviewed, and the viability of the scheme reassessed.	Significant progress has been made on Welborne since the hearings and the site promoter and master developer, Buckland Development Limited, have provided evidence on to support the delivery rate assumptions.
Southern Planning for Raymond Brown		Housing Supply Revised housing supply position is less than that set out in the submission Local Plan and therefore there is a shortfall and additional sites should be found. Not clear whether reduction is 357 or 448. Council should produce an updated version of Table 4.2 from the plan for clarity.	The Housing Supply Topic Paper clearly demonstrates that the total Local Plan housing supply is in excess of the housing requirement, and therefore a contingency buffer exists. This consultation is not concerned with omission sites.
		Contingency buffer inadequate given Fareham's history of under delivery.	Whilst the contingency buffer has reduced to 7.1%, the Council is confident that this is sufficient particularly given the greater certainty over permitted sites, including

			Welborne, that has developed in recent years. There is no policy requirement to have a contingency over the housing requirement and as the delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings, the Council disagrees that 7.1% is insufficient.
		Stepped Requirement not justified, suppresses delivery in the early years of the plan period. Local Plan should provide a range of sites which can deliver in the short, medium and long term to ensure a consistent 5-year housing land supply throughout the plan period which would enable the housing delivery test to be met and negate the 'need' for a stepped housing trajectory. Support the statement at paragraph 3.5 that the stepped housing trajectory not expressed as a maximum.	The Council considers a stepped requirement is justified to ensure that the policies within the plan, once adopted, can carry full weight as soon as possible and that the Council meets its housing need over the lifetime of the plan. The first 'step' as proposed is shorter than in the submitted plan, only applying to the first two years of the plan period. The proposed approach ensures that under delivery is addressed as soon as possible and that projected completions are above the minimum housing need for the vast majority of the plan period. Identifying further sites will not increase delivery in the early years of the plan period.
		Do not believe there is sufficient evidence to offer confidence that the proposed delivery rates are realistic particularly in light of the Council's historic record of under delivery.	The delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings.
		It is not considered consistent with national policy to make the housing trajectory artificially low to reduce the 5 year housing land supply and ensure the council pass the Housing Delivery Test to avoid the presumption in favour of sustainable development.	The Council considers a stepped requirement is justified to ensure that the policies within the plan, once adopted, can carry full weight as soon as possible. The Council's belief in a plan-led system means it is illogical to progress a Local Plan to adoption only for the policies which are most important for determining planning applications to be out of date on the basis of poor HDT results in line with paragraph 11 of the NPPF.
		The proposition that by 2023-24 the Borough will be able to achieve an average delivery of 653 homes per annum is not credible. There is no evidence to support	Delivery assumptions have been informed by ongoing engagement with landowners and site promoters. Furthermore, the housing supply and associated delivery

		the significant increase in delivery rates from 210 dwellings per annum to 653 dwellings per annum.	rates were thoroughly tested during the Local Plan examination hearings.
	Paragraph 4.6	Authorities should use the standard method as the starting point when preparing the housing requirement. As such, the standard method housing requirement should be exceeded as necessary to ensure sufficient homes are delivered.	The housing supply identified in the plan meets the housing requirement, and exceeds the standard method figure over the plan period.
	Paragraph 4.7	We do not believe that it is 'impossible' to boost supply in the first couple of years of the plan period. It is possible that windfall sites are in the pipeline and it is also possible that small scale sites could come forward. Particularly if the advice of the PPG is followed when granting planning permission, pre-commencement conditions should only be used where there is a clear justification for imposing one, which would help to speed up delivery.	Disagree. Due to the lag time between a site being permitted and being built out, it is impossible to boost the housing supply in the first two years of the plan. It is expected that anything built in the first couple of years already has planning permission, with a small site windfall allowance applying from year 4 onwards (2025/26 in a trajectory with a base date of 1 st April 2022).
	Paragraph 4.7	The number of homes under construction exceeds the stepped housing trajectory of the first two years of the plan period by 86 homes, if this is the case and the housing supply is increasing as permissions have now been able to be granted, then the stepped trajectory in the first two years should be increased to reflect this.	The proposed stepped requirement is set at a level to enable the Council to pass the HDT as soon as possible, avoid the associated implications and ensure development in the Borough can be genuinely plan led as soon as possible.
		In light of the complexities surrounding the general town centre allocation (Policy BL1) and the reliance on Welbourne, we are not convinced that the 5 year housing land supply can be sustained. Five-year supply is marginal and could easily decrease.	The Council does not disagree that a rolling 5YHLS of greater than five years would give greater comfort of a plan-led approach, there are other factors to take into account. First, plans have to be reviewed every five years and a predicted lack of five-year supply might be a trigger for future review. This is clearly a matter that the Council will keep under close review. Additionally, the

		Submission plan had far more favourable five-year supply position.	Government has signalled the removal of this requirement where plans are in place and up to date. This second factor is another reason why the plan is likely to be reviewed within five years to ensure the continuation of a five-year supply.
Tetrattech for Vistry Group		The reduction in overall housing supply is a step in the wrong direction in ensuring the plan is flexible and robust enough to deliver the required amount of housing. The contingency buffer inadequate given reliance on large scale strategic sites. A larger contingency should be applied and more sites identified.	Whilst the contingency buffer has reduced to 7.1%, the Council is confident that this is sufficient particularly given the greater certainty over permitted sites, including Welborne, that has developed in recent years. There is no policy requirement to have a contingency over the housing requirement and as the delivery and developability of the proposed allocations were thoroughly tested during the Local Plan examination hearings, the Council disagrees that 7.1% is insufficient. The Council disagrees that further sites should be identified in the plan.
		The stepped trajectory is not justified particularly given FBC's poor delivery rates over recent years. Pleased to see that the initial 'step' is shorter. However, HDT should not be a reason 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. The justification for a stepped trajectory is further weakened by the poor delivery rates over recent years and FBC's current HDT measurement. The likelihood of FBC meeting the housing requirements in full within the plan period is therefore highly uncertain unless more sites are allocated, particularly in the early part of the plan period.	The proposed stepped housing requirement ensures that the Council meets its own housing need over the lifetime of the plan. The first 'step' as proposed is shorter than in the submitted plan, only applying to the first two years of the plan period. The proposed approach ensures that under delivery is addressed as soon as possible and that projected completions are above the minimum housing need for the vast majority of the plan period. Identifying further sites will not increase delivery in the early years of the plan period.

Turley for Reside Developments		Appeal recently allowed on land south of Funtley Road which grants outline planning permission for up to 125 dwellings on the site. Query why the delivery assumptions included in the Topic Paper do not align with 'Site Delivery Statement' provided to the Council on 20 th June 2022. Also request that policy HA10 is the subject of a main modification to reflect the outcome of the appeal.	Comments noted. The papers were prepared before the 20 th June, however, the planning permission for up to 125 dwellings was reflected in the trajectory in the topic paper.
Woolf Bond for Foreman Homes		The Council's stepped requirement is not justified. Affordability ratios are worsening, primarily as a result of the unjustified and overly optimistic expectations of delivery including from Welborne and other sites.	The Council considers a stepped requirement is justified to ensure that the policies within the plan, once adopted, can carry full weight as soon as possible. The first 'step' as proposed is shorter, only applying to the first two years of the plan period, so whilst lower than that in the submitted Plan, is for a reduced period. This is essential to enable the Council to pass the HDT as soon as possible, avoid the associated implications and ensure development in the Borough can be genuinely plan led as soon as possible. Delivery assumptions are based on ongoing engagement with landowners and site promoters.
		Although paragraph 3.2 references the increase in the Borough's housing requirement from the existing Plan (equates to 337.67dpa) to the Local Housing Need ('LHN') figure of 541, this discounts the position that the Borough has been subject to higher housing figures in the intervening period such as illustrated in the PUSH Position Statement (2016) (FBC053) or the derivation of LHN following the implementation of this within the NPPF. Since these higher levels of growth have	Disagree. The PPG, as referred to in paragraph 3.2 identifies that the change is between emerging and previous policies. The PfSH position statement is not adopted policy but also proposed a housing need of 420dpa for Fareham (see table 1 FBC053) which further backs up the Council's argument of a significant change (541dpa is 29% higher than 420dpa).

		been accepted through the Council's decision-making process together with appeals, it is not such a significant increase.	
		<p>No clear evidence provided to demonstrate deliverability of a number of proposed site allocations:</p> <p>HA22 Wynton Way HA24 Gosport Road HA29 Land east of Church Road HA36 Locks Heath District Centre HA37 Former Filing Station, Locks Heath Centre HA44 Assheton Court HA7 Warsash Maritime Academy</p>	<p>Disagree, there have been no changes to these sites and their deliverability was discussed during the hearing sessions. The Council has gathered evidence for each site from the promoters as follows:</p> <p><u>HA22 Wynton Way</u> Council owned site, delivery statement was completed by Fareham Housing in October 2021 with delivery indicated in 2024/25.</p> <p><u>HA24 335-337 Gosport Road</u> Hampshire County Council owned site, delivery statement was completed in October 2021 with delivery indicated in 2023/24.</p> <p><u>HA29 Land East of Church Road</u> Privately owned site, delivery statement was completed in April 2021 with delivery indicated to commence in 2023/24, pushed back in the trajectory by the Council to 2024/25 to ensure not overly optimistic.</p> <p><u>HA36 Locks Heath District Centre</u> Enabling works application to reconfigure car park is under consideration, delivery statement from developer, statement of common ground with developer.</p> <p><u>HA37 Former filling station, Locks Heath Centre</u> Enabling works application to reconfigure car park is under consideration, delivery statement from developer, statement of common ground with developer.</p> <p><u>HA44 Assheton Court, Portchester</u></p>

			<p>FBC owned site, delivery statement provides trajectory. Planning application received July 2022.</p> <p><u>HA7 Warsash Maritime Academy</u> Ongoing discussions with the site promoter including pre-application enquiries with an application for 125 dwellings received by the council received in March 2022.</p> <p>This evidence informed the delivery timeframes set out in the topic paper and earlier trajectories.</p>
Lee Residents' Association		Maintaining objection to HA55 on grounds of reduced strategic gap, impacts on local roads, water shortage, nitrogen pollution of groundwater, air quality danger areas and pressures on public services.	Comments noted. However, HA55 is not the subject of this consultation