

Examination of the Fareham Local Plan 2037

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Gayle Wooton
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By email via the Programme Officer

Dear Ms Wooton,

Examination of the Fareham Local Plan 2037

Further to your submission of the Fareham Local Plan 2037, I have commenced my initial reading of the plan, the supporting evidence and representations.

Based on what I have read so far, I have several initial questions and requests for further information and clarification which I set out below. The Council's responses to these will help to inform the matters issues and questions (MIQ's) and the remaining timetable for the examination.

Legal Compliance

- 1. I note from the Council's submission letter that it is intended to review the Statement of Community Involvement in early 2022. The Planning Practice Guidance (PPG) encourages authorities to update their SCIs where they are inconsistent with the latest COVID 19 guidance. Why did the Council consider this was not necessary? What steps did the Council take to ensure that sections of the community without access to the internet could engage in the examination process?
- 2. Did the revised Regulation 19 consultation seek comments on the whole plan or just the revisions?
- 3. Have any concerns been raised in relation to the Equality Impact Assessment?

Duty to cooperate

4. I am aware of the proposed review and update to the Partnership for South Hampshire (PfSH) Spatial Position Statement with a new Joint Strategy. This document will consider the predicted unmet housing need in the sub region and look at the potential for Strategic Development

Opportunity Areas. Can the Council please advise me of the programme of work to be undertaken and its anticipated timeframe?

Habitats Regulation Assessment (HRA)

Nitrate Neutrality

5. Appendix 3 of the HRA (ISLP008) includes a Technical Note regarding the Nitrogen Budget. Section 4 discusses potential nutrient mitigation schemes. What is the current position on their availability? I note from Strategic Policy H1 that there are approximately 4184 homes on sites with resolutions to grant planning permission at 1 April 2021. These permissions have been stalled because of this issue. When is it anticipated that these sites will be granted consent?

Recreational Impacts on the New Forest

6. The Statement of Common Ground (SoCG) with Natural England (SG006) discusses the need for a strategic cross boundary strategy to tackle the impact of recreational disturbance on the New Forest SAC/SPA/RAMSAR. I note that the Council has joined the project steering group to work with other affected authorities. In the meantime, until this has been agreed, Natural England suggest an interim mitigation strategy be prepared. What progress has been made with this? Has a programme of work and timetable been set out?

Housing Needs

- 7. Paragraph 4.2 of the plan indicates that the housing need figure using the standard methodology is 541 dwellings per annum. Please point me to where in the evidence base this calculation is set out.
- 8. The PPG¹ sets out that a stepped trajectory may be appropriate where strategic sites may have a phased delivery or are likely to deliver later in the plan period, specifically in Fareham, the Welborne Garden Village. The supporting text in the plan provides some justification for the stepped requirement but this is limited. What further evidence can the Council provide to support this approach?
- 9. The Affordable Housing Strategy (HOP001) indicates that 3500 affordable homes will be required from 2021-2036. I am unclear how this figure has been calculated. Furthermore, it does not cover the plan period to 2037. I request that the Council sets this out in detail having regard to the advice in the PPG² which sets out how affordable housing need and supply can be calculated. I note that the AMR (GEN006) includes data on affordable housing completions. Can the Council clarify the current level of shortfall, how and when this will be addressed, and whether the forecast need will be met over the plan period?

¹ Paragraph: 021 Reference ID: 68-021-20190722

² Paragraph: 006 and 007 Reference ID: 67-006-20190722

Housing land supply

- 10.I note the trajectory at Appendix 1 of the plan. However, paragraph 73 of the National Planning Policy Framework expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and for plans to set out the expected rate of development for specific sites. As is stands the trajectory does not meet this expectation. For each allocated site, it should indicate the likely start date for delivery and when a site is likely to be completed. Can the Council please provide a revised trajectory.
- 11. The AMR (GEN 006) provides a link to the Council's 5-year housing land position report. The most up to date assessment should be added to the evidence base.

Welborne Garden City

- 12. Can I request that the Welborne Plan be added to the evidence base?
- 13. The delivery of the Welborne Garden Village is important to meeting the housing requirements of the borough over the plan period. Has a Statement of Common Ground or Delivery Statement been agreed with the site promoters? If so, can it be provided? What evidence is there to support the anticipated delivery rates for the site over the plan period and beyond. What is the current position with planning consent and also the delivery of infrastructure?

Main Modifications

- 14. In accordance with section 20(7C) of the Planning & Compulsory Purchase Act 2004 (as amended), can the Council confirm whether they wish me to recommend any Main Modifications necessary to rectify matters that make the Plan unsound.
- 15.Do the Council have a running list of draft Main Modifications they wish to make in light of representations, SoCG etc. If so, can a copy be provided and placed on the examination web site.

I would be grateful for an initial response to this letter by 3 December 2021. If further work needs to be undertaken to enable the Council to respond fully to any of the questions or requests for further evidence, please provide a timetable for the completion of this work. Please could the Council also upload this letter on to the website as an examination document.

If you have any queries, please contact me through the Programme Officer.

Yours sincerely

Helen Hockenhull

Inspector