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**Planning Policy,
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Ref:

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Dear Claire

Re: Fareham Borough Council Regulation 18 - Portsmouth City Council response

Thank you for consulting Portsmouth City Council on the emerging Fareham Local Plan. The Council would like to make the following comments:

Housing needs

Portsmouth City Council (PCC) works closely with Fareham Borough Council (FBC) as a fellow member of the Partnership for Urban South Hampshire (PUSH), through the Solent Transport partnership, and as a neighbouring planning and highway authority. The two authority areas have strong social and economic ties.

The last *Strategic Housing Market Assessment* prepared by PUSH noted that both Portsmouth and Fareham (eastern wards) fall within one single Housing Market Area.

PCC is working with FBC on strategic planning issues, in both the production of a review of the PUSH Planning Position Statement and in production of a Statement of Common Ground for strategic planning matters. Both pieces of work are ongoing but the Council is keen to reflect the ongoing collaborative work in a formal Statement in due course.

PCC has published a Housing and Economic Land Availability Assessment which shows a shortfall of capacity in the city of some 2,800 dwellings over the same plan period. Given the size of the shortfall it is extremely likely that the City will not be able to meet its own Local Housing Needs as assessed using the government's standard methodology. It should be noted that the delivery rates implied by the above figures represent a 24% increase over the current level set in the adopted Portsmouth Plan, demonstrating the comprehensive and proactive search for capacity undertaken to date.

This will be a critical element for both PCC and FBC to consider in the finalisation of a Statement of Common Ground, either as part of a PUSH-wide review or other arrangement.

In the absence of an up to date position statement agreeing distribution of housing between the PUSH Authorities on the basis of the standard methodology, and the further work needed in finalising the capacity of the City of Portsmouth through its emerging Local Plan, we recognise that it is not currently possible to quantify the level of undersupply from the city which would need to be accommodated in Fareham Borough, but note that this will be a significant issue for both authorities in the future.

Housing Market Area

Both Portsmouth and Fareham (eastern wards) comprise parts of the same housing market centred around Portsmouth City.

It is important to recognise the importance of the interconnectivity of the settlements that make up the housing market area, and the different roles the settlements in the housing market area play, as recognised in the PUSH Strategic Housing Market Assessment.

There is movement of people between different parts of the housing market area dependent upon their specific housing needs and requirements as they vary throughout their lifetime.

The current Standard Methodology for assessing Local Housing Need does not capture this complexity within the housing market area. The Council would be keen to work with Fareham and others in the Portsmouth Housing Market Area to ensure these connections are recognised in future cross-boundary work.

Employment

In regard to employment the two Local Authority areas form part of a wider market area, with people commuting for work between the city and the surrounding towns including Fareham and the M27 corridor. Portsmouth City has a limited number of potential sites available for additional employment land provision to meet its needs, though the exact quantum of needs is still being ascertained through ongoing work. There is potential within the wider market area to provide for employment need, and therefore the City Council will be keen to work with Fareham Borough Council to consider this further through PUSH or other discussions

Cities first

The previous PUSH joint statement promoted a cities first approach to the direction of development. The City Council considers that any review of the development strategy for South Hampshire and emerging Local Plans should continue to ensure that development of the wider south Hampshire area should not prejudice the delivery of regeneration and investment in the cities.

Portsdown Hill

Portsdown Hill is an extremely important part of the landscape in South East Hampshire. The importance of the hill has been recognised through a number of planning documents including: The adopted Portsmouth Local Plan, The North Fareham SDA Study, the South East Plan, Hampshire Integrated Transport Assessment, and Draft Havant Local Plan. The City Council considers that it is important that the importance of Portsdown Hill for its landscape and conservation value is appropriately addressed in emerging planning strategies and therefore is keen to work with Fareham Borough Council as the Fareham Local Plan progresses to ensure that views to and from the hill are adequately considered

as both the emerging Fareham and Portsmouth local plans progress.

Nitrates working together

The Council is keen to work with Fareham Borough Council and other partners including the Water Companies and Natural England on delivering an appropriate response to the issue of nitrates in the Solent.

Education

Portsmouth City Council continues to maintain close links with Hampshire County Council as Education Authority due to cross border pupil movement. Development on the proximity of this border can impact the availability of school places across authorities and therefore the timing and size of development should be closely monitored to ensure the continued availability of school places during the life of this plan.

Transport

Portsmouth City Council and Fareham Borough Council share a significant level of interdependency in regard to the transport network and how that network supports travel to work journeys in particular. Portsmouth, like Fareham, is subject to a ministerial directive to address air quality issues identified in the respective areas and as such Portsmouth City Council is developing a strategy to improve Air Quality based around modal shift to more sustainable forms of transport. A significant part of this long term strategy is the continued development of the South East Hampshire Rapid Transit network which will link Portsmouth to Fareham and on to Gosport, as well as Waterlooville, Havant and the Isle of Wight. In partnership with Hampshire County Council and the Isle of Wight Council, Portsmouth City Council is preparing a bid to the Transforming Cities Fund to aid delivery of the first stage of the SEHRT network that builds on the great successes of the Eclipse Corridor in Gosport and Star Corridor between Waterlooville & Portsmouth. Portsmouth City Council would encourage that the promotion and development of the emerging SEHRT network is put at the forefront of any future development plans across the Fareham BC area. Equally, opportunities to build in walking and cycling facilities (such as those identified in the Local Cycling and Walking Infrastructure Plan currently in development) to connect in with existing routes linking Portsmouth to Fareham should be prioritised to ensure that new and existing residents have a full range of travel options available.

Kind Regards

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