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**Planning Policy,
Planning and Economic
Development**

Portsmouth City Council
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Ref:

25 February 2020

Dear Gail,

**Re: Fareham Borough Council - Local Plan 2036 Supplement:
Portsmouth City Council response**

Thank you for consulting Portsmouth City Council on the emerging Fareham Local Plan. The City 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 South Hampshire (PfSH), 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 PfSH 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 PfSH Planning Position Statement and in production of a Statement of Common Ground for strategic planning matters. Both pieces of work are on-going, but the City Council is keen to reflect the on-going collaborative work in a formal Statement in due course.

PCC published a *Housing and Economic Land Availability Assessment* in February 2019 which shows a shortfall of capacity in the city of some 2,800 dwellings over the same plan period. An update to the HELAA is currently being finalised but the draft shows that there is an expected shortfall of just over 3,000 dwelling expected in the plan period to 2036. 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 32% increase over the level set in the adopted Portsmouth Plan, demonstrating the comprehensive and proactive search for capacity undertaken to date.

In the absence of an up to date position statement agreeing distribution of housing between the PfSH Authorities on the basis of the standard methodology, the City Council will set out its position for its Local Authority neighbours to help provide certainty through the Duty to Cooperate. The City Council therefore requests that Fareham Borough accommodates 1,000 dwellings of the city's unmet housing need.

Housing Market Area

Both Portsmouth and Fareham (eastern wards) comprise parts of the same housing market, centred around Portsmouth. 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 PfSH 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 City 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, Portsmouth and Fareham's 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. The exact quantum of employment floorspace required in Portsmouth to support anticipated growth during the plan period is still being ascertained through on-going assessment work, due to be finalised in spring 2020. However, it is known that Portsmouth has a limited number of potential sites available for additional employment land provision to meet its needs, and previous assessments have indicated that a shortfall could be possible, particularly in terms of industrial B1 - B8 class uses. There is potential within the wider market area to provide for employment need, and the City Council request joint working with Fareham Borough Council to consider this further through PfSH or other discussions.

Strategic Growth Areas

The City Council welcomes the provision of the two Strategic Growth areas in Fareham Borough's Local plan, which have the potential to meet unmet development needs from the Borough's neighbouring authorities. As outlined above Portsmouth has unmet housing need and potentially unmet employment need. Both of the two Strategic growth areas are reasonably accessible to Portsmouth. However, of the two areas, north of Downend is better located to accommodate unmet housing need from Portsmouth, with a close geographical proximity to the city and good transport links via the M27/ A27, Portchester railway station and the proposed Bus Rapid Transit (BRT) line. A specific reference to Portsmouth's unmet housing need in relation to the North of Downend Strategic Growth Area would provide a clear indication of how the two authorities are dealing with Portsmouth's unmet need through the Duty to Cooperate.

'Cities first'

The previous PfSH 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 this landscape 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 the Draft Havant Local Plan. The City Council considers that the importance of Portsdown Hill, for its landscape and conservation value, should be appropriately addressed in emerging planning strategies, and therefore is keen to work with Fareham Borough Council to ensure that views to and from the hill are adequately considered as both the emerging Fareham and Portsmouth Local Plans progress. The City Council will look to work with Fareham Borough Council on a specific piece of work cross boundary work to assess the landscape value of Portsdown Hill.

'Nutrient neutral' mitigation and other environmental off-setting

The City Council is committed to continuing to work with Fareham Borough Council and the other members of the PfSH Water Quality Working Group on short, medium and long term 'nutrient (nitrate) neutral' mitigation solutions for housing development within the Solent catchment. Current discussions indicate that mitigation solutions are likely include the identification and securing of suitable off-setting land in the Solent catchment outside the Portsmouth City Council area (due to the nature of the city), including land within Fareham Borough. The City Council are willing to enter into legal agreements Fareham with BC, as deemed appropriate, to ensure the monitoring and enforcement of such off-setting land in perpetuity.

The City Council is also mindful of the likely forthcoming requirement to provide at least 10% biodiversity net gain on development sites, as part of the anticipated Environment Act. While the City Council is currently undertaking further work to explore how such requirements could be effectively applied within an urban environment and to identify off-site opportunities for biodiversity creation and/ or enhancement within the city, there is the potential for a shortfall in net gain provisions (subject to the final provisions of the Environment Act) within the plan period. Securing land for nitrate mitigation presents one such opportunity to seek multiple environment benefits for the sub region (biodiversity net gains, carbon off-setting, Suitable Alternative Greenspaces (SANGs) for recreational disturbance, habitat compensation of coastal defence schemes etc); the Council are therefore looking to enter into further discussions with Fareham BC and the other PfSH authorities on this matter and to consider the potential for environmental off-setting on both a sub-regional and a site by site basis as appropriate.

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 (SEHRT) 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 and Portsmouth. The 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 Portsmouth's 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,

Rachel Cutler

Acting Planning Policy Manager

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