



UPDATED STATEMENT OF COMMON GROUND ON HOUSING LAND SUPPLY MATTERS

**SECTION 78 APPEAL BY FAREHAM LAND LP AND
BARGATE HOMES LTD**

**LAND AT NEWGATE LANE (NORTH) AND
LAND AT NEWGATE LANE (SOUTH),
FAREHAM**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**LPA REF: P/18/1118/OA & P/19/0460/OA
APPELLANT REF: BRS.4989
PINS REF: APP/A1720/W/20/3252180 & APP/A1720/W/20/3252185**

 Signed:	 Signed:
Name: Richard Wright	Name: Neil Tiley
On behalf of: Fareham Borough Council (the Local Planning Authority)	On behalf of: Pegasus Group (acting on behalf of the Appellant)
Date: 22 nd January 2021	Date: 22 nd January 2021

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1. INTRODUCTION

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Pegasus Group, on behalf of Fareham Land LP and Bargate Home Ltd (“the Appellant”).
- 1.2 It has been prepared in conjunction with Fareham Borough Council (“the LPA”). It relates to a planning appeal made pursuant to Section 78 of the Town and Country Planning Act 1990, in respect of Land at Newgate Lane (North) and Land at Newgate Lane (South), Fareham (“The Appeal Sites”).
- 1.3 The purpose of the SoCG is to identify the areas where the principal parties (the Appellant and the LPA) are in agreement and to narrow down the issues that remain in dispute on this matter. This will allow the Inquiry to focus on the most pertinent issues.

2. MATTERS NOT IN DISPUTE

- 2.1 This section sets out the matters that are not in dispute between the Appellant and the LPA.
- 2.2 It is agreed that the LPA is currently unable to demonstrate a five-year land supply and that as a result the presumption in favour of sustainable development of paragraph 11d applies for the determination of this appeal, provided that in undertaking his/her appropriate assessment, the Inspector concludes that the proposal will not adversely affect the integrity of the habitats site (with reference to paragraph 177 of the NPPF).
- 2.3 It is agreed that new Housing Delivery Test results were published on 19th January 2021 and that as a result it is now necessary to apply a 20% buffer in Fareham.
- 2.4 It is agreed that whilst the respective parties differ on the precise extent of the current shortfall, with the LPA identifying a 3.4 year land supply and the Appellant identifying a 0.97 year land supply, the shortfall is material on either basis. As such it is not considered necessary for the Inspector to conclude on the precise extent of the shortfall.
- 2.5 It is agreed that, in order to make the most efficient and effective use of Inquiry time, insofar as it is necessary, the matters of dispute on housing land supply would be best dealt with at the Inquiry by way of a round table discussion.

3. MATTERS IN DISPUTE

- 3.1 The Appellant considers that there is no evidence that the LPA will restore a five-year land supply in the foreseeable future.
- 3.2 The LPA consider that the shortfall in supply will be short lived upon the adoption of the emerging Local Plan.