



Fareham Borough Council  
Housing Delivery Test Action  
Plan

Adopted June 2021

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# 1. Introduction

- 1.1 The Housing Delivery Test (HDT) was introduced by the Ministry of Housing, Communities and Local Government (MHCLG) in 2018 to ensure that local authorities are held accountable for their role in ensuring new homes are delivered.
- 1.2 The HDT assesses the number of homes built in each local authority area over the previous three years and compares these against local housing requirements. Local Planning Authorities that fail to meet delivery targets are required to take appropriate action to address under delivery.
- 1.3 The methodology for calculating the HDT measurement is set out in the Housing Delivery Test Measurement Rule Book<sup>1</sup>, and the Ministry of Housing, Communities and Local Government (MHCLG) publish the HDT result for each local planning authority in England annually.
- 1.4 The requirements of the HDT are set out in the National Planning Policy Framework (NPPF)<sup>2</sup>. They include:
  - Where the HDT is below 95% the requirement to publish an action plan; and
  - Where the HDT is below 85% a 20% buffer must be applied to the authority's 5-year land supply; and
  - From 2020 where HDT is below 75% the presumption in favour of sustainable development must be applied. (Please note for the transitional years 2018 and 2019 this threshold was 25% and 45% respectively).
- 1.5 The 2020 HDT results were published in January 2021 and identified that Fareham had achieved 79% of the housing required in the Borough over the three years from 2017 to 2020. As delivery has fallen below the 95% requirement, the Council are required to produce an Action Plan. In addition, as the figure is below 85% a buffer of 20% will also be applied to the Borough's 5-year housing land supply.

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<sup>1</sup> [Housing Delivery Test measurement rule book - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/541111/housing-delivery-test-measurement-rule-book-2018-2020.pdf)

<sup>2</sup> [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/541111/national-planning-policy-framework-2019.pdf)

## 2. Purpose of this Action Plan

2.1 The purpose of this Action Plan is:

- To provide a short summary of the Council's HDT results and its implications; and
- To provide an analysis of the key reasons for the historic under-delivery of new homes in the district against its housing requirement; and
- To identify the measures the Council has already undertaken and intends to undertake to increase and accelerate the delivery of new housing in the district; and
- To identify the monitoring arrangements for the HDT Action Plan.

2.2 The Council recognises that delivering growth within the district is complex. Whilst it is noted that a number of the actions identified in the HDT Action Plan are principally within the remit of the Council to resolve (such as the production of planning documents and the timely determination of planning applications for housing schemes), the Council will also need support and the co-operation of those involved in delivering new homes including landowners, developers, land promoters, infrastructure providers (such as utility providers) and upper tier authorities (i.e. Hampshire County Council).

2.3 It is important to note that the Council must not only deliver the number of homes that are needed in the Borough but also that the housing delivered provides a suitable mix of homes to meet the need identified in the Borough such as affordable housing and specialist accommodation, as set out in the NPPF.

## 3. Past and Future Housing Delivery Performance

### Past Delivery Performance

3.1 Fareham's HDT measurements to date are set out in the table below:

	<b>2015-2018 HDT</b>	<b>2016-2019 HDT</b>	<b>2017-2020 HDT</b>
<b>Requirement</b>	741	941	1,102
<b>No. of Homes Delivered</b>	1021	937	886
<b>Delivery Percentage</b>	137%	99%	79%
<b>Consequence</b>	None	None	Action Plan and 20% Buffer

Table 1: Fareham HDT measurements

3.2 For the purposes of the HDT results to date, Fareham's housing requirement is set out on the adopted Local Plan which consists of three parts:

- Local Plan Part 1: The Core Strategy
- Local Plan Part 2: Development Sites and Policies
- Local Plan Part 3: The Welborne Plan

3.3 Part 1: The Core Strategy, was adopted in 2011 and Parts 2 and 3 were adopted in June 2015.

3.4 The chart below shows the past five years housing completions in comparison to the requirement identified in the Local Plan or the standard methodology. This chart shows that whilst the housing completions have stayed relatively stable 270-290 homes for the majority of the period, the annual housing requirement has increased. This is in part due to the adopted Local Plan including the expectation that Welborne will start delivering (see section 4) and the introduction of the standard methodology. Delivery for the year 2020/21 is not yet confirmed.

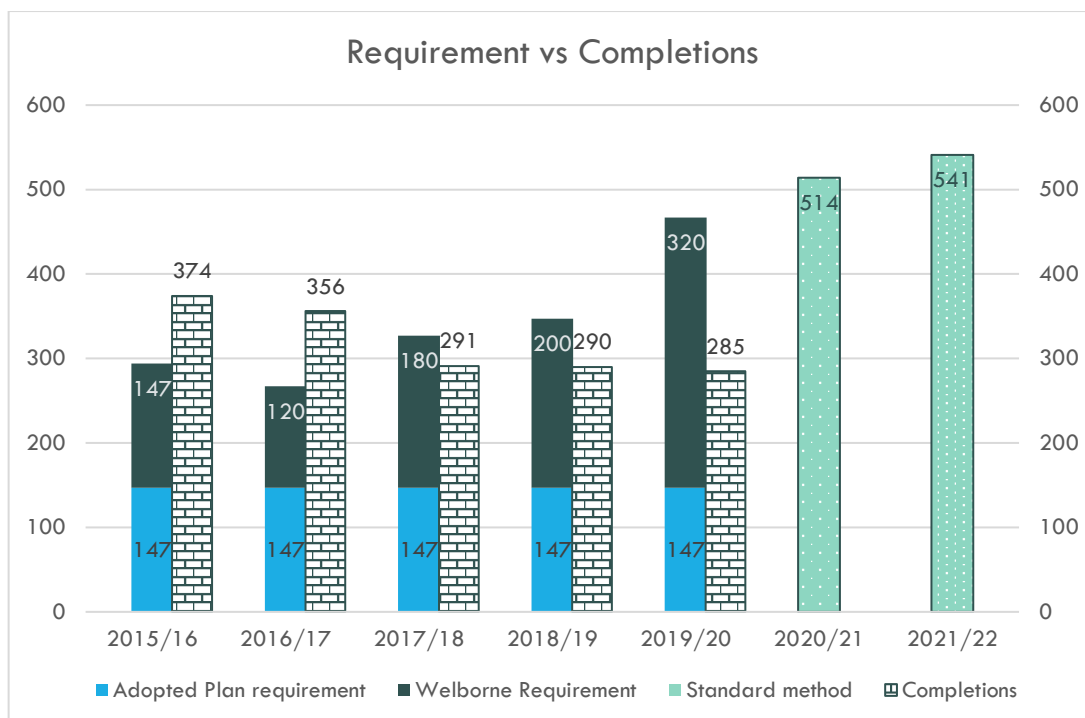


Chart 1: Housing delivery performance

- 3.5 The number of houses built in any given year is, in part, a reflection of the number of sites with planning permission. There is a lag between the granting of planning permission and the completion of new home on sites, often around 1-2 years for sites with detailed planning permission and 2-3 years on sites with outline planning permission. The lag time between the granting of planning permission and commencement is dependent on the size of the site and other related matters (such as the provision of infrastructure as well as the impact of extraneous events such as the impact of COVID 19). Fareham Borough Council recognises that it did not deliver sufficient housing to meet its locally identified housing need over the last three years.

### Future Housing Requirement

- 3.6 As the adopted Local Plan is over five years old, from June 2020 onwards, the Borough's housing requirement will be calculated using the standard method as set out in national planning practice guidance.
- 3.7 The standard method calculates how many homes are needed by taking into account household projections based on house prices compared to local salaries. This method sets the Borough's housing requirement for 2021 at 541 dwellings per year.
- 3.8 In addition, under the Localism Act 2011, local planning authorities and other duty to cooperate partners are required to cooperate with each other when preparing or supporting the preparation of policies which address strategic matters. This is known as the Duty to Cooperate. Making appropriate provision for housing (including affordable housing) is considered to be one of these strategic matters under the NPPF. In accordance with paragraph 65 of the NPPF, when establishing the housing

requirement for the Borough, Fareham will need to consider how the Borough can address the unmet housing needs of neighbouring local planning authorities.

- 3.9 Once adopted, the housing figure set out in the plan will be the requirement against which the Borough is tested in future HDT. This requirement will also include any contribution to unmet need in neighbouring authorities that the Local Plan may make.

## 4. Cause Analysis

- 4.1 This section identifies and outlines the on-going delivery challenges faced by the Borough.

### The Emerging Local Plan

- 4.2 The Council committed to reviewing the Local Plan in 2015, following the adoption of Fareham's Local Plan parts 2 and 3, undertaking an initial Regulation 18 Consultation on the Draft Local Plan in 2017. However at the same time as the Council were consulting on this document, the Government undertook a consultation called 'Planning for the right homes in the right places' which proposed changes to the National Planning Policy Framework (NPPF), including a new method for calculating housing need using the standard method. As a result of the 2017 Government consultation the standard method was introduced which meant that the Draft Local Plan would not meet the new identified housing target and did not meet new NPPF requirements.
- 4.3 The Council commenced a review of the Draft Local Plan to address the increase in housing requirement and to ensure that the policies complied with the revised NPPF undertaking an Issues and Options consultation in 2019 which informed the preparation of the Supplement to the Fareham Local Plan. This Supplement in turn was the subject of a Regulation 18 consultation in early 2020. The results of these three consultations combined informed the preparation of the Publication Local Plan.
- 4.4 In August 2020 the Government published a new planning consultation called 'Changes to the current planning system' which proposed the use of a new standard methodology to the way housing need is calculated. The proposed new formula continued to take into account household projections as set out in the current standard methodology but also considered a Local Authority's existing housing stock.
- 4.5 This change to methodology meant that Fareham's identified housing need decreased significantly from that identified in 2018, leading to the re-evaluation of the scale of housing growth required for the Local Plan. The subsequent Regulation 19 consultation undertaken in November/December 2020 returned to a lower housing requirement as indicated by the Government consultation.
- 4.6 In late December 2020, the Government published the results of their consultation which reverted to the previous standard method for calculating the housing requirement, meaning that the Council needed to undertake further work to address this need. In addition, the latest affordability data released by the Office for National



Statistics<sup>3</sup> in March 2021 set out that the Borough's average house prices have increased whilst simultaneously the median earnings have dropped more than 9%. This means a further increase in the housing requirement for the Borough to 541 dwellings per year.

- 4.7 It has always been the Council's intention to meet the identified housing need, however the changes to the planning system and housing need calculations have meant that there has been continued uncertainty in terms of what should be planned for. The Council have had to undertake a number of changes to the emerging Local Plan in an effort to ensure the plan is meeting the identified need which has led to repeated delays in the progression of the plan. The lack of an up to date plan and sufficient allocations to meet the current level of housing need has resulted in considerable uncertainty for the Council's Planning Committee.

### Welborne

- 4.8 The Local Plan Part 3: The Welborne Plan identifies that the site known as Welborne to the north of the Borough for 6,000 homes. The Council is working in partnership with the developer and other organisations including Hampshire County Council, Homes England and MHCLG to progress development at this site. The application has been supported by Planning Committee with resolutions to grant in October 2019 and January 2021, and the subsequent s106 is well advanced.
- 4.9 The housing trajectory set out in the adopted Local Plan Part 3 anticipated the site would commence in 2016/17, delivering 1,160 homes by April 2021. Delivery at Welborne has been affected by a number of factors including the resolution of land ownership issues, and the design and funding of the M27 motorway junction. To date the site has yet to commence building. These issues have led to the revision of the original delivery trajectory (see Table 2 below) with the first dwellings now anticipated to be completed in 2023/2024.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2020>

Year	Welborne Plan trajectory	April 2021 Housing trajectory
2015/16	0	
2016/17	120	
2017/18	180	
2018/19	200	
2019/20	320	
2020/21	340	
2021/22	340	
2022/23	340	
2023/24	340	30
2024/25	340	180
2025/26	340	240
2026/27	340	240
2027/28	340	240
2028/29	340	280
2029/30	340	300
2030/31	340	300
2031/32	340	300
2032/33	280	300
2033/34	280	300
2034/35	280	300
2035/36	260	300
2036/37	0	300
<b>Total</b>	<b>6,000</b>	<b>*3,610</b>

\*Delivery will continue past 2036/37 to achieve 6,000 homes

Table 2: Comparison between the Welborne Plan Housing Trajectory and the latest as of April 2021.

4.10 The Council has been proactive in trying to resolve funding and delivery issues at both the local and national level. It successfully achieved Garden Village status for the scheme in January 2017 which is an important factor in terms of relations with Government and its agencies around funding opportunities, expertise and brokerage. Successive rounds of lobbying activity has taken place to secure funding for the J10 motorway junction, which is a key piece of infrastructure required in the initial phases of the development. Changes to the funding arrangements have been the principal reason behind the need to take the application back to Planning Committee early this year, but as previously stated, permission was granted, subject to the s106 agreement.

#### Nutrient neutrality and impacts of Protected Sites

4.11 The issue of nutrient neutrality has had a significant impact on development in the Borough and the wider Solent area following Natural England’s advice to local councils reflecting European case law (the Dutch case). The advice requires that every application for development which would result in a net increase in overnight

accommodation must demonstrate that their proposals maintain or reduce the levels of nitrates leaving their site or provide mitigation. This is to protect the Solent, a Protected Site, from higher levels of nitrates (due to increased amounts of wastewater created by new dwellings) which is likely to have a significant effect, as higher levels of nitrates in the water can cause an increase in the growth of plants and algae which, in turn affects oxygen and light levels within the water, thus affecting other species and habitats.

4.12 As a direct result of the advice from Natural England, a significant backlog of outstanding planning applications has built up for housing proposals within Fareham Borough since February 2019. Consequently, as detailed in chart 2 below, a significantly reduced number of planning permissions for new dwellings have been granted in Fareham Borough since early 2019, with a drop to just 73 net new homes, in the reporting year 2019/20. Often nitrate neutrality and the lack of mitigation is the only reason that the decision could not be made. As such, nutrient neutrality is identified as a primary constraint to the Council’s ability to grant permissions. At its highest in 2020 there were applications amounting to 1,400 homes which could not be progressed until a nitrate solution could be found. Whilst this is not a significant factor in the results of the 2020 HDT, it is likely to have a significant impact on future results.

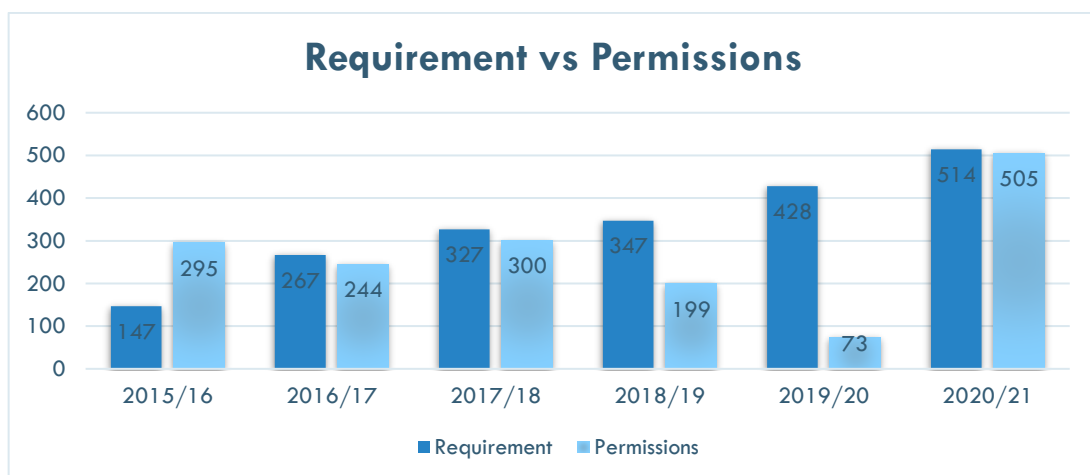


Chart 2: Housing delivery performance and permissions granted

4.13 Chart 2 illustrates the impact of the nitrates issue on the Council’s ability to determine applications due to the impact of nutrient neutrality. The significant drop in the number of applications that the Council were able to approve, and the subsequent reduction in new homes delivered will have an effect on the HDT results in future years.

4.14 An additional impact of the existence of Protected Sites within the Borough is that there is a requirement for some development sites to identify mitigation should land identified as having a functional link to sites protected for Solent Waders and Brent Geese be proposed for development. This mitigation requirement, and in many cases, the inability for developers to put forward a suitable mitigation solution, impacts the suitability of some potential housing sites in the Council’s Land Availability

Assessment. Moreover, the Government's Permission in Principle (PiP)<sup>4</sup> tool is not available to the Council, as applications in the entire Borough are subject to a requirement for Habitats Regulations assessment and as such PiPs are a tool which cannot be used in the Borough.

#### Covid-19

- 4.15 The unprecedented emergence of the Coronavirus has brought numerous challenges upon the Council as a whole, including challenging the Development Management service's ability to continue progressing planning applications during successive lockdowns. However, officers have continued to work diligently from home, including successfully undertaking a series of Planning Committee meetings. The number of planning applications is higher in the first three months of 2021 than in the first three months of 2020, but many of these applications are householder applications and will not result in new homes.
- 4.16 It is recognised that the Ministry for Housing Communities and Local Government reduced the housing requirement for 2019/20 by one month in the HDT 2020, the implications of which will impact the next two sets of HDT results. At the time of writing, it is unclear whether a similar concession will be applied to the housing requirement for 2020/21 which would impact the results of future HDTs.

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<sup>4</sup> <https://www.gov.uk/guidance/permission-in-principle>

## 5. Ongoing Actions

- 5.1 The Council has been aware of the Government's growing emphasis on housing delivery for a number of years and is already working to support this in a number of ways. This section establishes what the Council is already doing to address housing delivery.

### Local Plan Review

- 5.2 Recognising the importance of a plan-led system, the Council's first priority is to progress the Local Plan to examination and subsequent adoption. Work has been underway since 2015 to review the Local Plan, with the Council undertaking four consultations in two years, as a direct result of the numerous changes to the planning system during the plan's preparation, and in particular the changing policy landscape around housing need.
- 5.3 To ensure progression and seeking to avoid any further delays, in 2020 the Council undertook a Regulation 19 consultation as timetabled in the approved Local Development Scheme, incorporating the Government's proposed methodology for calculating housing requirements. As a result of the Government not moving ahead with the proposals, the Council must now undertake further work and consultation adding delay to the progress of the Local Plan.

### Welborne Garden Village

- 5.4 Welborne Garden Village forms an essential part of the Borough's housing delivery and therefore progression of the development is key in meeting Fareham's need. As such it is essential that funding is secured to meet the costs associated with the infrastructure requirements of the project and to secure a delivery partner in progressing the scheme.
- 5.5 The Council will continue to work with the applicant, Homes England and others as necessary to secure a funding package for J10 motorway junction and to move the development towards delivery in line with the revised trajectory. It will work with the developer to deliver a Design Code for the development in line with the reserved matters applications.
- 5.6 The Council have recently undertaken a review of its CIL charging schedule to 'zero-rate' Welborne in line with the Welborne Plan and in recognition of the £308m contribution towards infrastructure, more appropriately gathered through the S106 legal mechanism. It is anticipated that the new charging schedule will be adopted in the coming months.

### Nutrient neutrality – finding mitigation

- 5.7 The effect of nutrient neutrality has and will continue to be significant on the progression of planning applications, and therefore on meeting the Borough's housing

need and future HDTs. Securing mitigation to address this issue is key to enabling housing delivery in the Borough.

- 5.8 The Council has worked hard to find a resolution to this issue. Solutions have now been identified and implementation has begun to mitigate the impact of nutrient neutrality on the Solent, allowing the backlog of permissions to be consented. Innovative solutions to address this issue includes retrofitting existing housing stock with improved water efficiency measures, taking land out of agricultural use and putting the land to alternative uses such as wetland creation. All of these solutions effectively create nitrate 'credits' which can be used to offset additional nitrates emanating from new residential development. Whilst taking land out of agricultural production results in a one-off creation of credits, the creation of new wetlands alongside watercourses can result in a year-on-year removal of nitrates.
- 5.9 The Council is eager to progress any applications which have committed to a mitigation solution. To achieve this, a number of complex legal solutions have been required to allow the Council to grant permission for developments with mitigation land provided in areas outside of its geographical jurisdiction. This has required the signing of innovative legal agreements signed with mitigation providers and other Local Authorities who commit to monitoring the mitigation schemes. Two such agreements have now been approved by the Council<sup>5</sup>, with two more decisions due shortly, which affords the certainty required in the mitigation measures to issue permissions.
- 5.10 With agreements in place to deliver 4000 credits (sufficient for approximately 5000 homes across the sub-region) the Council has been keen to move ahead with granting permission for those applications caught in the backlog and have been holding a number of additional planning committees to ensure applications reach a resolution at the earliest opportunity.
- 5.11 It is worth noting that two decisions to grant planning permission with on-site nitrate mitigation have subsequently been challenged under judicial review, with hearings to be held in May 2021.
- 5.12 Whilst the existence of several mitigation schemes has allowed permissions for a number of homes to be issued in recent months (evidenced by the fact that the numbers of homes with permission granted since 18<sup>th</sup> November 2020 is 215) there is a continued need to find, assess and secure mitigation schemes to help deliver against the nitrate neutrality issue in the medium to long term.

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<sup>5</sup> Little Duxmore signed July 2020, Warnford Estate signed March 2021, Heaton Farms and Nunwell estate due May 2021

## Nitrate neutrality – working with partners to lobby Government

- 5.13 The Council, along with other planning authorities and members of Partnership for South Hampshire (PFSH) who are also affected by the issue, have on numerous occasions raised the issue of nitrate neutrality with MHCLG, Defra and their agencies. Through PFSH, we have secured the agreement of Southern Water to undertake voluntary monitoring on wastewater treatment works with no nitrogen permit, updated the Integrated Water Management Study to understand fully the impact of Natural England's methodological assumptions on the quantum of mitigation required throughout the lifespan of a Local Plan, and secured funding to appoint a Strategic Environmental Planning Officer to work to develop a pilot strategic solution for the sub-region.
- 5.14 Whilst there has been a significant amount of engagement, particularly at the local level, the response from MHCLG in relation to issues of five-year housing land supply and the HDT has not been positive. The following table illustrates the ongoing nature of the issue and the lobbying undertaken to date:

<b>Date</b>	<b>To</b>	<b>Lobbying</b>	<b>Response</b>
28 Jun 2019	James Brokenshire MP (Secretary of State for Housing Communities and Local Government)	PFSH – Letter: Re: Nitrate neutrality requirements and the impact on housebuilding across South Hampshire	23 July 2019 from Kit Malthouse MP. Referenced the important issue and revised NE methodology. Pointed to Catchment Sensitive Farming and Government work on environmental land management
25 Oct 2019	Esther McVey MP (Minister of State for Housing MHCLG)	PFSH – Letter: Formal request to the MHCLG to suspend National Planning Policy Framework Housing Delivery Tests for Partnership for South Hampshire local authorities.	16 <sup>th</sup> November 2019 referencing pre-election period preventing any commitment to action on the HDT.
14 Jan 2020	Robert Jenrick MP (Secretary of State for Housing Communities and Local Government) and Theresa Villers MP (Secretary of State for the Department of Environment, Food and Rural Affairs)	East Hampshire District Council and Havant Borough Council – Letter: RE: Nutrient neutrality and the impact on housebuilding and five-year supply	9 March 2020 response from Luke Hall MP denied request to remove obligation to comply with policy 11d of the NPPF and stated that MHCLG would keep the HDT under review.
7 Dec 2020	Christopher Pincher MP (Minister of State for Housing MHCLG)	PFSH -Letter: Request for the temporary suspension of the five-year housing land supply requirement across the South Hampshire Sub-region	18 December 2020 response denied removal of the 5-year housing land supply requirement so that house building can play a role in economic recovery.
8 Apr 2021	Christopher Pincher MP (Minister of State for Housing MHCLG)	Suella Braverman MP – Letter highlighting Fareham's HDT result and impact of nitrate neutrality	27 April 2021 response references 'continual monitoring' of the HDT, but the Government wishes to realise the aim of 300,000 homes a year.

Table 3: Nitrate neutrality government lobbying undertaken to date

- 5.15 In the responses received, the message from Government is clear that they are committed to achieving the aim of delivering 300,000 homes per year by the mid-2020s and as such the Council should seek solutions to enable housing delivery, particularly in the light of the economy recovery from the Coronavirus pandemic.

#### Development Management solutions

- 5.16 The Council's Development Management team has already taken steps to ensure the application process is streamlined, offering pre-application services and recently introducing planning performance agreements<sup>6</sup> In addition, the addition of a foreshortening of commencement condition has been used to ensure the prompt delivery of some sites.
- 5.17 The Adopted Local Plan contains a policy guiding development management decisions in situations where the Council cannot demonstrate a five-year housing land supply. Policy DSP40 in Part 2 of the Local Plan<sup>7</sup>, has been a useful tool in defending the Borough from unsustainable development, but also allows the Council to be proactive and grant permission on sites otherwise deemed to be unsuitable, but that where the harm is outweighed by the benefit of delivering homes. To date, permission has been granted for 873 homes in the countryside across the Borough as a result of the application of policy DSP40. The Council believes that this innovative policy is vital to ensuring sustainable development can be delivered in times of short land supply and will continue to apply it rigorously and defend it robustly.

#### Developer Engagement

- 5.18 The Council has sought to identify a supply of developable sites through regular engagement with landowners, agents and site promoters, undertaking regular "call for sites" for assessment, updates of the Brownfield Land Register, ensuring that the Council is never "closed" to such potential sites.
- 5.19 The Council undertakes regular (at least six monthly) engagement with developers to track the delivery of sites identified to provide for the Borough's five-year housing land supply, to identify and understand any issues which these sites may be encountering which may create a barrier to delivery. In addition, council officers undertake quarterly site monitoring exercises to monitor the ongoing progress toward completion of sites with permission.

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<sup>6</sup>

<https://modern.gov.fareham.gov.uk/documents/s25724/Planning%20advice%20design%20codes%20conservation.pdf>

<sup>7</sup> <http://www.fareham.gov.uk/PDF/planning/LP2DSPAdopted.pdf>



### Affordable Housing Programme

- 5.20 In 2019 the Council adopted a new Affordable Housing Strategy<sup>8</sup>, to provide more affordable homes, ensuring they are the right homes in the right places for those in need of affordable housing. The strategy's objectives include delivering more affordable homes through the planning system and to directly deliver more affordable homes by Fareham Housing. The strategy sets out a number of actions to achieve the objectives.
- 5.21 As part of this work, the Council has identified a number of sites on its own land which are progressing as part of the Revised Publication Local Plan to provide affordable housing. These 6 sites aim to provide approximately 150 new affordable dwellings as well as replacing existing housing with new, improved provision.

### Fareham Town Centre Regeneration

- 5.22 In line with the Fareham Town Centre Vision 2017 and the Government's objectives to see the regeneration of towns following the impact of the pandemic, the Council has focussed its search for additional developable housing sites on sustainable town centre locations. This has resulted in a Revised Publication Local Plan which identifies a broad location of growth in Fareham Town Centre. This will achieve a significant number of sustainably located homes and revitalise the Borough's main centre delivered through a Fareham Town Centre Masterplan Supplementary Planning Document.

### Summary

- 5.23 In summary, the Council are pro-actively engaging with the community, members and developers to provide the most effective planning service whilst seeking solutions to the ongoing issues and difficulties which it faces. This action plan includes a number of measures which the Council has and will continue to undertake to tackle these challenges. The success of these measures will be recorded in the annual Authority Monitoring Report and demonstrated in future HDT results.
- 5.24 However, the scale of these issues and difficulties cannot be tackled by the Council alone and it is essential that the wider input of Government bodies including MHCLG and DEFRA in communication with Homes England and Natural England are brought to bear for the Council to be successful in meeting the delivery of its housing needed.

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<sup>8</sup> [http://www.fareham.gov.uk/PDF/housing/AHS\\_2019.pdf](http://www.fareham.gov.uk/PDF/housing/AHS_2019.pdf)

## 6. Strengthened actions

### Enhanced Member training

- 6.1 The delivery of housing is often a sensitive issue for communities and elected Members to consider and ensuring that the Council have engaged proactively to communicate the Borough's need and options to address it is important to gain their understanding. The Council will continue to inform the community and seek to ensure newly elected Members on Planning Committee are provided with training and kept updated of the Borough's housing delivery position, alongside the regular five-year housing land supply reports.

### Strengthened Government lobbying on the impact of nitrate neutrality on HDT results

- 6.2 As described in section 4, the impact of the need for nitrate neutrality has severely impacted the Council's ability to grant planning permissions and despite the Council's best endeavours to secure mitigation schemes and therefore to lawfully grant permissions, there will undoubtedly be an impact on housing delivery from the low level of permissions granted in 2019/20. Much as the Government has chosen to apply a concession to the HDT 2020 for the Coronavirus pandemic recognising the inability of the house building profession to build homes, the Council will continue to seek, both independently and with PfSH, a concession in relation to its inability to grant housing permissions.

## 7. Action Plan

Action Area	Aims and Objectives	Timescale	Monitoring/Measure of Success
1. Local Plan Progression	<ul style="list-style-type: none"> <li>Progress the Fareham Local Plan 2037 through Regulation 19 Consultation to Examination by Winter 2021/Spring 2022.</li> <li>Seek to diversify supply through introduction of small-scale development policy.</li> <li></li> </ul>	Ongoing to 2022	<ul style="list-style-type: none"> <li>Submission to Secretary of State for Examination</li> <li>Adoption of Local Plan 2037 by 2022.</li> <li>Secure a 5-year housing land supply and HDT over 75%, at least, via a stepped requirement.</li> <li>Achieve site diversity, smaller sites delivering more quickly.</li> <li></li> </ul>
2. Welborne Progression	<ul style="list-style-type: none"> <li>Secure delivery partner for J10</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Appointment of delivery partner</li> <li>Progression of Welborne</li> </ul>
	<ul style="list-style-type: none"> <li>Secure funding package for J10</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Achievement of funding</li> <li>Progression of Infrastructure delivery</li> <li>Progression of Welborne</li> </ul>
	<ul style="list-style-type: none"> <li>Issue outline consent and S106</li> </ul>	Asap	<ul style="list-style-type: none"> <li>Progression of Welborne</li> </ul>
	<ul style="list-style-type: none"> <li>Review Strategic Design Code and reserved matters for first phase of development when received</li> <li>Prepare for Planning Committee approval</li> </ul>	Asap	<ul style="list-style-type: none"> <li>Progression of Welborne</li> </ul>
	<ul style="list-style-type: none"> <li>Complete review of CIL charging schedule</li> </ul>	By end of 2021	<ul style="list-style-type: none"> <li>Progression of Welborne</li> </ul>
3. Nutrient mitigation	<ul style="list-style-type: none"> <li>Promotion of identified mitigation to site developers in order to progress applications to decision-making stage</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Additional take up of mitigation solution</li> <li>Increased application resolution</li> </ul>
	<ul style="list-style-type: none"> <li>Continue to seek mitigation solutions for development</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Additional sites identified and engaged for mitigation purposes</li> </ul>
	<ul style="list-style-type: none"> <li>Additional Planning Committees to consider stalled applications</li> <li>Progression of previously stalled applications with identified nutrient neutrality mitigation to decision.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Increased number of permissions</li> </ul>

	<ul style="list-style-type: none"> <li>PfSH co-operation and wider input from Government bodies including MHCLG, DEFRA along with Natural England and the Environment Agency to identify solution.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Solution identification and implementation</li> </ul>
	<ul style="list-style-type: none"> <li>Lobbying of Government in relation to effect on HDT</li> <li>Government to consider the impact of nutrient neutrality on the Council's housing delivery and revise the HDT appropriately.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Positive government response</li> <li>HDT test revision</li> </ul>
4. Development Management	<ul style="list-style-type: none"> <li>Member training in relation to housing delivery alongside training and information on 5YHLS and presumption in favour of sustainable development</li> <li>Planning Committee to receive a presentation on the Housing Delivery Test</li> </ul>	2021/22	<ul style="list-style-type: none"> <li>Timely resolution of applications</li> <li>Continued member awareness of HDT and its implications.</li> </ul>
	<ul style="list-style-type: none"> <li>Communicate permissions rate, housing need, HDT results and Local Plan methodology to Members and community</li> <li>Seek Member and community support of Local Plan.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Successful adoption of Local Plan</li> <li>Increased delivery rates</li> </ul>
	<ul style="list-style-type: none"> <li>Pre-application advice service actively encouraged.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Reduction in number of applications which are withdrawn/refused.</li> </ul>
	<ul style="list-style-type: none"> <li>Provision of Planning Performance Agreement</li> <li>Provide clarity of timescales, setting out an efficient and transparent process for determining large and/or complex planning applications.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Timely resolution of applications</li> </ul>
	<ul style="list-style-type: none"> <li>Addition of condition foreshortening delivery commencement to encourage commencement of site and therefore prompt delivery.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Increased delivery rates</li> </ul>
5. Affordable Housing Programme	<ul style="list-style-type: none"> <li>Delivery of affordable housing on Council owned land to meet identified housing need.</li> <li>Continue to progress existing Fareham Housing Projects.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>Progression of actions as set out in the Affordable Housing Strategy</li> <li>Deliver affordable housing sites identified in the Revised Publication Local Plan</li> </ul>

6. Fareham Town Centre Regeneration	<ul style="list-style-type: none"> <li>• Preparation of Fareham Town Centre Masterplan Supplementary Planning Document</li> <li>• Provide a planning framework for the mixed-use regeneration of Fareham Town Centre at the Broad Location of Housing Growth identified in the Local Plan</li> <li>• Provide increased certainty for landowners, developers and investors</li> </ul>	Ongoing to 2022	<ul style="list-style-type: none"> <li>• Increased housing delivery at Fareham town centre</li> </ul>
7. Site Identification	<ul style="list-style-type: none"> <li>• Strategic Housing Land Availability Assessment updates</li> <li>• Brownfield Land Register Updates</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Identify appropriate sites for development.</li> </ul>
8. Developer Engagement	<ul style="list-style-type: none"> <li>• Regular engagement with developers/site promoters with sites identified within the Council's five-year housing land supply.</li> <li>• Gain understanding of developer issues and identify potential Council-led solutions.</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• 5YHLS confirmation</li> <li>• Appropriate application submission rate and subsequent completions</li> </ul>
9. Proactive Monitoring	<ul style="list-style-type: none"> <li>• Quarterly site visits to identify potential barriers to commencement</li> <li>• Engagement with developers regarding site delivery</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Site delivery</li> </ul>