

FAREHAM BOROUGH COUNCIL

Town and Country Planning Act 1990 – Section 78

SECTION 78 APPEAL

SUPPLEMENTARY STATEMENT ON POLICY DSP40 AND HOUSING LAND SUPPLY MATTERS

**LAND AT NEWGATE LANE EAST, FAREHAM
Appeal by Bargate Homes Ltd.**

Planning Inspectorate Reference: APP/J1725/W/20/3269030

Fareham Borough Council Reference: P/19/1260/OA

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FBC.28 Land off Station Road, Long Melford appeal decision (APP/D3505/W/18/3214377)

FBC.29 Fareham Borough Council Housing Delivery Action Plan May 2021

FBC.30 Committee report – 22 – 27a Stubbington Green

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FBC.33 Coleman’s Lane Nitrate Mitigation Scheme – Officer Report

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FBC.36 Written statement from Leader of the Council at Full Council meeting on 10th June 2021

FBC.37 Press release: Revised Welborne Planning Application (dated 10th June 2021)

FBC.38 Fareham Borough Council Local Development Scheme June 2021

1 Introduction

- 1.1 This Supplementary Statement has been prepared in response to the Appellant's further update to its Statement of Case as set out in its Statement on Policy DSP40 and the Housing Supply Update Statement submitted to the Inspectorate in May 2021. It should be read alongside the Council's Statement of Case, April 2021.

2 The weight to be afforded to Policy DSP40

- 2.1 The Appellant asserts that the weight to be attached to Policy DSP40 is “diminished” since it is considered out-of-date with reference to footnote 7 of the Framework. In reaching this judgement it relies on one appeal decision at BurrIDGE for a single dwelling (ref. APP/A1720/W/18/3209865 included at Appendix 1 of the Appellant’s supplementary statement). The Appellant argues that Policy DSP40 must be awarded substantially reduced weight commensurate with the significant shortfall in housing land in Fareham Borough.
- 2.2 Section 7 of the Council’s Statement of Case, April 2021, sets out a compelling case as to why the Appellant’s position is flawed with reference to three recent appeal decisions at Down End Road, Portchester (FBC.4), Land East of Posbrook Lane (FBC.5) and Land West of Old Street, Stubbington (FBC.6). The Council’s position is that notwithstanding the extent of the housing shortfall in each of these cases, these decisions emphasise that Policy DSP40 should be afforded full weight and that conflict with it should be a matter of substantial/ the greatest weight in the event of a housing land supply shortfall because it provides a mechanism for the controlled release of land through a plan-led approach.
- 2.3 Contrary to the Appellant’s assertion, at paragraph 3.5, the Old Street, Stubbington appeal decision does not predate the revised NPPF when footnote 7 was introduced. An update to the 2012 NPPF was published on 24th July 2018 and this version was in place at the time the Inquiry was held in December 2018 and at the time of the Inspector’s decision on 22nd January 2019. The NPPF, July 2018 introduced footnote 7 to paragraph 11 (previously paragraph 14 in the NPPF 2012), and this footnote remains unchanged in the current NPPF published in February 2019.
- 2.4 In respect of the BurrIDGE case, the Inspector concluded:
- “By virtue of footnote 7 of the Framework, the failure of the Council to demonstrate the requisite housing land supply renders out-of-date those policies which influence the location and distribution of new housing. This includes CS Policies CS2, CS6 and CS14, LPP2 Policies DSP6 and DSP40 and the settlement boundaries upon which these policies rely. I have therefore attached limited weight to the conflict with development plan policy regarding housing in the countryside.” (paragraph 32)*
- 2.5 It is clear that the Inspector in this instance has attached limited weight to conflict with policy arising solely from the housing in the countryside. He does not state the weight he has given DSP40 in isolation, rather he has said that he would dismiss the appeal because of harm to character and appearance and biodiversity. His approach therefore is consistent with the approach taken by the Inspectors in the Portchester, Posbrook Lane and Land West of Old Street appeal decisions.
- 2.6 Inspector Jenkins in a very recent appeal decision (Appeal Decision A Ref. APP/A1720/

W/20/3252180 Land at Newgate Lane (North), Fareham and Appeal B Ref: APP/A1720/W/20/3252185 Land at Newgate Lane (South), Fareham) provided at Appendix FBC.27 (the Newgate Lane North and South appeal decisions) further supports the Council's view that the weight to be given to Policy DSP40 is not substantially reduced by virtue of it being out-of-date for the purposes of paragraph 11 of the Framework. He also departs from the Inspector's conclusion in respect of the Burrridge case. He concludes at paragraph 107 that:

"... I consider, for a number of reasons, it does not automatically follow that conflicts with this Policy also attract little weight, contrary to the approach of my colleague who dealt with appeal decision Ref. APP/A1720/W/18/3209865." [the Burrridge Case]

- 2.7 In reaching this conclusion, Inspector Jenkins has regard to the purpose of Policy DSP40 at paragraph 107. He concludes, consistent with the Council's opinion, that its purpose is to seek to address a situation where there is a five-year housing land supply shortfall by providing a mechanism for the controlled release of land outside the urban area boundary, within the countryside and Strategic Gaps, through a plan-led approach. It is for this first reason why he considers the DSP40 does not automatically attract little weight. He then goes on to consider the weight that should be attached to each of component parts of Policy DSP40 having regard to the particular circumstances of the case. He concludes at paragraph 110 that:

*"They [criteria ii and iii] represent a relaxation of the requirements of Policies LP1 Policies CS14 and CS22 as well as LP2 Policy DSP6 in favour of housing land supply. However, I consider that the shortfall in the Framework required five-year housing land supply, which has persisted for a number of years and is larger than those before my colleagues, indicates that the balance they strike between those other interests and housing supply may be unduly restrictive. Under these circumstances, in my judgement, **considerable, but not full weight is attributable to conflicts with LP2 Policy DSP40(ii) and (iii).**"(underlining added) (Paragraph 110)*

- 2.8 At paragraph 111, in respect of criteria (v) he concludes:

*"Fourthly, insofar as LP2 Policy DSP40(v) seeks to avoid an unacceptable impact on highway safety, with particular reference to traffic implications, it is consistent with the Framework and conflict with that requirement would be a matter of the **greatest weight.**" (underlining added) (Paragraph 111).*

- 2.9 Inspector Jenkins' conclusions on the weight to be attached to Policy DSP40 was influenced by his findings on the Council's deliverable supply and progress on the Local Plan Review based on the available evidence at the time as evidenced in paragraphs 89, 90, 91 and 92 of the decision letter.

- 2.10 He concluded at paragraph 89 that the Council's expectations of housing delivery was likely to be unrealistic given the uncertainty over the delivery of sites with a resolution to grant consent (held back by the nitrates issue). At paragraph 90 he further considered there to be uncertainty surrounding the delivery of Welborne. For this reason he erred on the side of

caution at paragraph 91, concluding the supply was likely to be closer to the Appellant's estimate than the Council.

2.11 At paragraph 92 he considered that the Local Plan was at a relatively early stage and further noted that no firm date had been set for its adoption.

2.12 However, the evidence base has now changed in respect of each of these matters and the basis upon which he reached his decision on the weight to be attached to Policy DSP40 is no longer up-to- date. The Council has therefore updated its position at paragraph 5.13 – 5.25 below. The Council therefore maintains its position that the weight to be attached Policy DSP40 is not diminished and that it should be afforded full and substantial weight.

3 Whether the proposal is ‘well-related’ to the existing urban settlement boundary

- 3.1 The Council refutes the Appellant’s case that it has not taken a consistent approach to assessing development proposals against the requirement of Policy DSP40 (ii); that development must be well-related to existing urban settlement boundaries. In the case of each application submitted to the Council, the Council carefully assesses relationship of the proposed development to existing urban settlement boundaries having regard to the particular characteristics of the proposed development, including its location and the spatial extent, size and scale of the proposals.
- 3.2 In the context of the Appeal site, for the reasons explained in the Council’s Statement of Case, April 2021 and supporting Statement of Evidence by Lockhart Garratt, the proposed development would appear to be incongruous in relation to the existing urban settlement boundaries having regard to the characteristics of the development proposal and its particular location. That is not to say that in another location, the scale, location and type of the proposed development would not be considered appropriate. Indeed the Appellant has demonstrated by reference to other recent decisions at land East of Down End Road, Fareham, North and South Funtley and at Egmont Nurseries that development with varying characteristics and of different scales have been considered to be appropriate by the Council in other locations within the Borough when assessed against the requirements of policy DSP40(ii).
- 3.3 Inspector Jenkins at paragraph 58 in the Newgate Lane North and South appeal decisions (Appendix FBC.27) concluded that the Council’s decisions on other sites, unlikely to be wholly comparable to the Appeal Site, carry little weight:
- “... each case must be considered primarily on its own merits and in my view, the Council’s approach elsewhere would not justify harmful development of the appeal sites. I give little weight to those decisions of the Council.”(paragraph 58)*
- 3.4 The Council agrees that the decisions it has taken on other sites are of little assistance to the Inspector as the appeal proposals must be considered on its own merits.
- 3.5 It is agreed that it is not a requirement of Policy DSP40 for development to be modest, small scale or to ‘round off’ settlements to comply with DSP40 (ii). The Council is merely drawing attention to the fact that in the absence of these development characteristics in this particular location the proposed development is not considered appropriate. In reaching its decision regard has been had to the absence of built development to the north, south and west (on three sides) and the strong linear nature of the existing settlement boundary strengthened by a well-defined mature landscaping along its length. In this context, the development is not considered a logical extension to the existing urban area and neither

would it provide a defensible northern urban edge for the future.

- 3.6 Having regard to the above, it is not simply the case of ensuring that the form and layout of the proposed development complements neighbouring residential areas as described by the Appellant at paragraph 4.2. Other factors, such as those described above are more important in determining how far a development may be well-related to existing urban settlement boundaries. The appeal development is in any case in outline, so detailed matters in relation to the form and layout are still to be determined and are not material at this stage in the consideration of the proposal against the requirement of Policy DSP40 (ii).

4 Landscape Matters

- 4.1 In his recent Appeal Decision, referred to in paragraph 3.33 above and appended at FBC.27, Inspector Jenkins commented upon landscape matters relating to two sites that lie directly to the west of the site in question, separated by the Newgate Lane East corridor but clearly occupying the same discrete landscape area. These comments appear in paragraphs 16-38 of the Decision and are considered to be relevant to this Appeal.
- 4.2 With regard to the status of Peel Common, it should assist the Inspector to note that Inspector Jenkins supported the Fareham Landscape Assessment's description of it as an 'isolated small settlement' at paragraph 17 of the Decision.
- 4.3 Inspector Jenkins also offers a useful opinion on the effects of Newgate Lane East upon the landscape at paragraph 29 of his Decision. In this, he considers that whilst the landscape value of Local Landscape Character Area 8.1a has been reduced from to Medium by the highway construction, its susceptibility remains High because of the potential for further development to tip the balance from an overall rural to urban character. He therefore concludes that the overall sensitivity of LLCA 8.1a is medium/high, which is consistent with the Council's evidence for this Appeal.
- 4.4 In terms of the impact of the proposed schemes, Inspector Jenkin at paragraph 30 of his Decision finds that either of the schemes he considered (75 and 115 dwellings respectively) would be sufficient to tip the balance of the area towards a predominantly urban character, resulting in a Medium magnitude of change and an adverse landscape impact of Moderate to Moderate/Major significance even after mitigation. At paragraph 32 he considers this level of impact to result in significant harm to the landscape. Inspector Jenkin then goes on to consider visual impacts, placing value on the views from Newgate Lane across the valley (the sites of that particular appeal were in the foreground of these views) and the respite provided by the countryside surrounding Newgate Lane East when travelling between settlements. He therefore concludes at paragraph 36 that the visual impact would be Moderate to Moderate/Major adverse, and that significant visual harm would occur.
- 4.5 In considering the level of compliance with policy, Inspector Jenkins at paragraph 37 of his Decision notes that in his opinion it is unrealistic to expect the entirety of LLCA 8.1a to be protected from development in the context of making some provision for housing, but that significant harm would occur in that case. He concluded, however, that in relative terms, the situation of new development to the east of Newgate Lane East adjacent to existing urban areas would avoid creating a substantial new pocket of urbanising built development, implying that he considered the harm to the Strategic Gap may be less.
- 4.6 Matters relating to the Strategic Gap are also considered by Inspector Jenkins at

paragraphs 78-86 of his Decision. In this, Inspector Jenkins notes at paragraph 80 that he does not consider a simple measurement of Strategic Gap width to be an effective representation of the manner in which the Gap is likely to be experienced and understood. He considers Newgate Lane East to be a key route from which the Strategic Gap is experienced, and he notes at paragraph 81 that this also enables Peel Common to be appreciated as an isolated settlement. He found that the developments he was considering would greatly diminish the sense of separation provided by the Strategic Gap and this would cause significant harm to the integrity of the Gap. He further notes that this impact is likely to be greater than that of development to the east of Newgate Lane East and adjacent to Bridgemaury, as is the case for the land within the current Appeal, but only if Peel Common were to remain a small, isolated ribbon of development within the Gap, which is not the case under the current proposals.

5 Housing Land Supply

Response to the matters raised in the Appellant's Updated Statement on Housing Supply Matters

The Five-Year Housing Requirement

- 5.1 The PPG clearly states that there is no requirement to specifically address under-delivery separately when determining what the housing requirement should be as the affordability adjustment is applied to take account of this. The only instance where past under delivery is required to be taken account of is where an alternative approach to the standard method is used (Paragraph: 011 Reference ID: 2a-011-20190220).
- 5.2 The projected annual household growth should be based on 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period (Paragraph: 004 Reference ID: 2a-004-20201216). The 2014-based household projections use calendar years, not financial, therefore the household growth has been calculated from 2021 to 2031 for a base date of January 2021 as per the PPG. The months are irrelevant and so the Appellant is wrong to suggest that the 10 consecutive years should begin with 2020. Paragraphs 427 to 428 of the Inspectors recommendation to the Land off Station Road, Long Melford appeal decision (APP/D3505/W/18/3214377) also judged that the starting point should be the current year [FBC.28]. In this case, the base date for the supply is 1st January 2021 and the base date for the requirement is also 2021, there is no reason why a base date of 2020 should be used.
- 5.3 The base date of January 2021 means that the affordability ratios used in determining the housing requirement were appropriate. At that time the 2019 affordability ratios, published in March 2020, were the most recent as per the PPG. However the Council acknowledges that in April 2021 the affordability ratio of 2020 was adjusted producing a minimum local housing need of 541 homes per annum.
- 5.4 In the light of this change in circumstance, the Council's considers it is prudent to update its five year housing requirement based on the affordability ratio that now applies from 1st April 2021. On this basis, the updated housing requirement for the period 1st April 2021 – 31st December 2025 is 2,695 dwellings, assuming a requirement of 508 per annum for the 3 months 1st January – 31st March 2021 and 541 dwellings per annum for the 4 years and 9 months between 1st April 2021- 31st December 2025, producing a housing requirement of 539dpa.

The Deliverable Supply

- 5.5 An adjustment has also been made to the supply of deliverable homes over the period 1st April 2021 – 31st December 2025 to take account of the revised trajectory for Welborne as

set out in the Housing Action Plan provided at FBC.29.

- 5.6 It is correct that the first completions are now anticipated in 2023/24. The Local Plan trajectory includes 450 homes in the first five years of the plan period, and this figure is included in the Housing Delivery Test Action Plan published on 8th June 2021. However, the 450 dwellings are projected to be delivered from the 1st April 2021 – 31st March 2026 and therefore an adjustment has been made on a pro rata basis to reduce the delivery over the period to 31st December 2025 to 390 dwellings (a reduction of 60 dwellings which are assumed to be delivered in subsequent period 1st January 2026 – 31st March 2026).
- 5.7 The updated total housing supply over the period 1st April 2021 – 31st March 2025 is therefore adjusted to 2, 310 dwellings.

Other minor revisions

- 5.8 Other minor revisions have also been made to the figures identified in the table at FBC.8 Deliverable Housing Land Supply as follows:
- Page 1 – “Large permitted sites with detailed consent” – Council’s position 402 (revised down from 408).
 - Page 15 – “Large unallocated sites subject to a resolution to grant planning permission” – Council’s position 663 (revised up from 657).
 - Page 19 – East & West of 79 Greenaway Lane, Warsash – Council’s position 30 (revised up from 24). Reserved matters approval has been granted on 21/04/21 for the first phases of this development for 6 detached homes.
- 5.9 These revisions do not affect the total housing supply rather simply change the categorisation of the site at East and West of 79 Greenaway Lane, Warsash.

Updated Five Year Housing Land Supply Position

<i>HOUSING REQUIREMENT</i>	
Local Housing Need: Dwellings per annum	539
Local Housing Need: Total requirement for 1st January 2021 to 31st December 2025	2,695
20% Buffer -delivery of housing over the previous 3 years, has fallen below 85% of the requirement, as set out in the 2020 Housing Delivery Test results	539
Total housing requirement for period from 1st January 2021 to 31st December 2025	3,234
Annual requirement for period from 1st January 2021 to 31st December 2025	647

HOUSING SUPPLY (Supply as set out in February 2021 HLS Position Statement (FBC.8) with adjustments as described above)	
Expected housing supply for the period from 1st January 2021 to 31st December 2025	2,310
Housing Land Supply Position over period from 1st January 2021 to 31st December 2025	-924
Housing Supply in Years	3.57

- 5.10 The Council's updated sources of supply figures categorised by status at the base date will be set out in the Statement of Common Ground on Housing Land Supply Matters which will be agreed with the Appellant,

Update on Deliverability of Housing Sites and the Local Plan Review

- 5.11 The Council's is able to provide an update to the Inspector in respect of the matters set out below.
- 5.12 In the very recent Newgate Lane North & South appeal decisions (Appendix FBC.27), Inspector Jenkins concluded that he considered it likely that "a shortfall in housing land supply will persist for some significant time to come" (paragraph 92). In reaching this view he had regard to the uncertain situation regarding nitrate mitigation (paragraph 89), the delivery of housing at Welborne (paragraph 90) and the likely adoption date of the emerging local plan (paragraph 92) as it was at the time of the Inquiry being held in February this year. The Council can provide an update on all three of these matters which have progressed significantly since then.

Nitrate mitigation

- 5.13 The Council's Statement of Case submitted in April this year, and subsequent to the Newgate Lane North & South Inquiry had closed, clearly sets out the considerable progress made by the Council in delivering nitrate mitigation (paragraphs 8.18 – 8.31). A second nitrate mitigation scheme at Warnford Park which was not available at the time of Inspector Jenkins' decision at Newgate Lane North & South is now available (paragraph 8.25). Warnford Park has the capacity to deliver 3,023kg in nitrate credits.
- 5.14 By way of an example of the mitigation offered at Warnford Park, planning permission was recently granted on 27th May 2021 for nine apartments at 22-27a Stubbington Green, Stubbington (planning application reference P/18/1410/FP submitted in December 2018). Appended to this updated statement is the Officer Report to Planning Committee (FBC.30) in which the means of nitrate mitigation is clearly set out at paragraphs 8.27 – 8.30 (in this instance 6.3kg of nitrate mitigation credits were required at Warnford Park).

Also appended is the Appropriate Assessment carried out by the planning officer using a recently developed pro-forma (FBC.31). Under the Council's duty to consult under Regulation 63 of The Conservation of Habitats and Species Regulations 2017, the Appropriate Assessment was sent to Natural England on 20th April. A response was received six days later on 26th April (appended at FBC.32) at which point the Appropriate Assessment was finalised ready for use. This example shows how this mitigation scheme, like Little Duxmore also, is effective in bringing forward housing sites stalled by the need for nitrate mitigation. It also demonstrates that the Council is well prepared to deal with such mitigation proposals from applicants, has an established and straight forward process for carrying out Appropriate Assessments quickly and easily and is able to consult Natural England and receive responses promptly without further delay.

- 5.15 A further third mitigation scheme has recently been approved for use by the Council. This mitigation scheme relates to land at Coleman's Lane on the Isle of Wight. As with Warnford Park and Little Duxmore before it, a tri-partite legal agreement between Fareham Borough Council, the owners of Coleman's Lane and the Isle of Wight Council is due to be completed imminently. The legal agreement as drafted is composed in a very similar manner to that for the aforementioned previous schemes and again secures mitigation land at Coleman's Lane against which applicants/developers may purchase credits. The land at Coleman's Lane has the capacity for 486kg of nitrate credits. Appended at FBC.33 is the Officer report recommending approval be given by the Director of Planning and Regeneration to enter into the legal agreement. Approval was subsequently given on 18th May this year.
- 5.16 Inspector Jenkins' comments in relation to the previously dismissed appeal are noted. However, the Council maintains that its significant progress and proactive approach to nitrate mitigation solutions means that there is no longer any impediment to applicants and developers in obtaining the appropriate mitigation to address this matter. The uncertainty referred to by Inspector Jenkins (paragraph 89 of the decision) has been suitably addressed and should no longer be seen as having a material impact on the delivery of sites identified in the Council's future five year housing land supply.

Welborne

- 5.17 Appendix FBC.13 to the Council's Statement of Case provides a Supplementary Statement on Welborne with regards to Deliverable Housing Supply. Since the time of producing that statement in April 2021 further progress has been made.
- 5.18 The Council has received a revision to the planning application including a Supplementary Planning Statement (Appendix FBC.34 to this statement), Viability Statement and EIA Statement of Conformity. The covering letter submitted to the Council dated 8th June 2021 (Appendix FBC.35) explains the purpose of the revisions. It says:

“... Following tireless work by Fareham Borough Council, Hampshire County Council, Homes England, The Ministry for Housing, Communities and Local Government and the Buckland team, the funding situation [for M27 J10] is much clearer, and is nearing final agreement. Further funding has been secured in principle (with final agreements programmed for the coming months), and the County Council are nearing a position where they can be confirmed as the delivery body for the improvements (subject to their Cabinet consideration on the 13th July). However, in order to finalise the funding arrangements and to begin to deliver Welborne, there is one final hurdle which necessitates a change to the proposals which have been made before your committee – namely the methodology to deal with potential cost overruns in the construction period.

It has been proposed, should cost overruns be identified, Buckland will provide a maximum additional payment of £10m to cover these cost overruns. This additional payment, if required, has an impact on the viability of the scheme. This will necessitate the activation of a mechanism, in which the affordable housing may need to be reduced below 10% to accommodate the additional payment. As the affordable housing has been set at a baseline of 10% to date, it is our understanding that this will necessitate a return to your planning committee to discuss this change.”

- 5.19 The Council have published the revisions to the planning application on its website and entered a further period of consultation which will run until 5th July. After then it is intended to take the application back to the Council’s Planning Committee as explained in the applicant’s covering letter. A copy of the written statement of the leader is provided at FBC.36 and the Council’s Press Release on Welborne is provided at FBC.37.

The Future Housing Supply: The Emerging Local Plan

- 5.20 The Council has now published its Local Development Scheme (June 2021) (FBC.38). Table 1, sets out the Fareham Local Plan 2027 timetable confirming the Council’s intention to consult on a revised publication local plan (Reg. 19) in Spring/Summer 2021 and submit the plan to the Secretary of State in Autumn 2021. The Examination is anticipated in Winter/Spring 2021/22 and the adoption of the Plan in Winter/Spring 2022. Contrary to the Appellant’s opinion, the Council considers that this timetable is realistic.
- 5.21 PINs maintain a list of Local Plans being progressed which details when they were submitted for examination and when they were adopted. Whilst there are a number of Local Plans that have been submitted since 2019 but have not yet been adopted, there are several examples which have progressed to adoption between 10 months and 1 year 9 months from submission. This suggests that the Council’s anticipated timetable is not unrealistic.

Local Council	Submitted	Adopted	Timescale
Chesterfield Borough Council	28/06/2019	15/07/2020	1 year 1 month
Durham Council	28/06/2019	21/10/2020	1 year 4 months
Hackney , London Borough of - Local Plan 2033	23/01/2019	22/07/2020	1 year 6 months
London legacy Development Corporation	08/03/2019	21/07/2020	1 year 4 months

North York Moors National Park	02/07/2019	27/07/2020	1 year
Northumberland National Park	30/09/2019	15/07/2020	10 months
Oxford City Council (2016-36 review)	22/03/2019	08/06/2020	1 year 3 months
South Kesteven District Council	14/01/2019	30/01/2020	1 year
South Oxfordshire District Council	29/03/2019	10/12/2020	1 year 9 months
Suffolk Coastal District Council	29/03/2019	23/09/2020	1 year 6 months

- 5.22 In order to be considered sound, Local Plans should deliverable as well as ambitious. There is also a requirement that the Local Plan should establish a five-year housing land supply upon adoption. In this regard and taking into account the requirement for a 20% buffer on five-year housing land supply, the specific figures of the stepped housing target proposed are necessary in order to both achieve a five-year housing land supply on adoption of the Local Plan that is realistic and can be sustained going forward. It is important to note that the stepped housing requirement is not expressed as a maximum figure and therefore allows for more dwellings than the target to be delivered per annum. The total requirement and the stepped targets reflect what can be delivered as evidenced in the SHELAA. The trajectory has been informed by regular engagement with developers and landowners and is considered to be reasonable and realistic. Table 3.2 of the Appellant's statements compares the need of Fareham against the stepped requirement and demonstrates a shortfall, which of course it would do as the first step in a stepped requirement is always lower than the average requirement, and so the table does not add anything to the Appellant's arguments.
- 5.23 Mr Tiley is correct in saying at paragraph 3.13 that the minimum housing need of 2,705 homes will be exceeded. However, the Local Plan is required to secure a 5YHLS on adoption and the unmet need contribution and 20% buffer need to be applied. Once you factor in these requirements, the total requirement would actually be 3,588, hence the proposal for the stepped requirement.