



The Planning Inspectorate

Examination of the Fareham Local Plan 2037

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By email via the Programme Officer

5 September 2022

Dear Mrs Wootton,

Examination of the Fareham Local Plan 2037

1. Thank you for your letter of 8 August 2022 (FBC092) responding to my Post Hearing letter (INSP15) and also the focussed consultation on the three Housing Topic and Background Papers (FBC077, FBC089 and FBC090).
2. I shall set out my response to any outstanding issues and also provide my further advice in relation to housing matters below.

Early Review of the Plan

3. I note the Council's confirmation of a commitment to an early review in the event that the Partnership for South Hampshire (PfSH) work concludes that the borough should make an additional contribution to regional unmet need. An early review is also now justified by the Council's reduced housing supply position as set out in the Housing Topic Paper (FBC 090) and reduced level of contingency. I request the Council draft some wording to be included in paragraph 4.5 of the plan as a Main Modification (MM) to outline the progress with the PfSH work and the intention to undertake an early review.

Development Strategy – Policy DS3 Landscape

4. My Post Hearing letter set out options for the Council to address the soundness issues I had raised about this policy designation. I have carefully considered the further report prepared by the Council's Landscape consultants (FBC096) responding to my comments and providing further evidence for the designation of Areas of Special Landscape Quality (ASLQ).

This evidence is helpful and satisfies my concerns. I note that a refinement is proposed to the ASLQ boundary in the Chilling/Brownwich area of the borough. This is justified by the evidence. MMs will be necessary to the Key Diagram, Fig 3.3 in the plan and the submitted Policies Map.

Welborne

5. My Post Hearing letter expressed concern about the delivery of this site in light of delays in the anticipated programme. Having also read the updated information from the site promoter (set out in their response to the consultation on the Housing Supply Topic Paper, FBC094), the suggested delivery of 150 homes in 2024/25 and a build rate of 250 dwellings per annum is justified. The Housing Topic Paper (FBC090) and the Trajectory in Appendix 1 of the Plan will need to be reviewed and updated accordingly.

Policy NE2 Biodiversity Net Gain

6. The Council suggest a modification to the policy to require Biodiversity Net Gain to be maintained for an appropriate period of time. Whilst I understand the Council's rationale for this, and I note the proposed clarification in the supporting text, I consider that this suggested wording is vague and ineffective. It should be modified to refer to a period of 30 years in line with the Environment Act. The Council may wish to revise the supporting text to explain their expectations.

Focussed consultation Housing Topic Papers

Housing Supply (FBC090)

7. A modification to Strategic Policy H1 is proposed to provide 9,560 net new homes during 2021-2037. This is proposed to be phased for the first 2 years of the plan period on the basis of at least 420 dwellings (averaging 210 dwellings per annum) and thereafter at least 9,140 dwellings (averaging 653 dwellings per annum). The proposed stepped trajectory is appropriate and justified. I shall set out my reasoning for this in detail in my final report.
8. Representors have pointed out some errors in the supply position and trajectory which appear to be relatively minor. I request the Council update the trajectory and supply position and publish a revised Topic Paper with the MM consultation.

Windfall Paper (FBC077)

9. The above document provides an updated windfall analysis from 2015-2021. I request that the Council revise the original background paper (HOP007) and publish it at MM stage as suggested.

Affordable Housing Background Paper (FBC089)

10. I appreciate the Council's efforts to recalculate affordable housing need using the methodology set out in Planning Practice Guidance (PPG).
11. Several representors have queried the significant reduction in the number of households on the Housing Register and the Background Paper explains in paragraph 3.9 that this is due to a review. It would be helpful to understand more about the detail of this review, how it was undertaken and the reasons why so many households were removed. The relevant section of the Background Paper should be expanded accordingly.
12. The Paper sets out in paragraph 3.32 how an estimate of the newly arising affordable housing need has been calculated. It explains why the PPG methodology¹, using minimum household incomes required to access lower quartile market housing has not been followed. The approach the Council has taken, calculating the proportion of affordable housing stock to market housing stock appears crude and risks not taking into account all relevant households. I have concerns that it could therefore be an underestimate and may not be robust and justified.
13. As such, I request that the Council follow the PPG methodology using the data sources available. I accept that this may need to be caveated as suggested in paragraph 3.31 of the Background Paper. Once this work has been completed a revised Background Paper should be prepared and again published alongside the MM consultation. Depending on the outcome of this work, the Council may also wish to put forward potential options to address any matters arising.

Next steps

14. I am aware that work on a schedule of MMs is underway, and I will liaise with the Council on its preparation. The Council should also consider any consequential changes to the Local Plan that may arise. The final version of the MM schedule should be provided to me for comment before being made available for public consultation.
15. The Council should ensure that they have met the requirements for sustainability appraisal by producing an addendum to the Sustainability Appraisal of the submitted plan in relation to the potential MMs, as appropriate. I would like to see a draft of the addendum and may have comments on it. The addendum should be published as part of the future MM consultation. The Council should also prepare any necessary update to the

¹ Paragraph :021 reference ID: 2a-021-20190220

Habitats Regulation Assessment and again I would like to see this before publication. The document should be published as part of the MM consultation.

16.I understand the Council is also preparing a list of Additional Modifications (AMs). The AMs are a matter solely for the Council. If the Council intends to publicise or consult on these it should be clear that such changes are not a matter for me to consider. I would however like to have sight of them for my information before consultation.

17.In line with the Examining Local Plans Procedural Practice document, the MM consultation should be undertaken for a minimum of 6 weeks. It should be made clear that the consultation relates solely to the proposed MMs. For clarity, representors may comment on post hearing evidence documents insofar as they are relevant to their representations on the MMs.

18.A timetable for the work remaining to be completed and the potential date for MM consultation should be provided to me as soon as possible. The MMs are put forward without prejudice to my final report. It is my expectation that issues raised in the consultation of the draft MMs will be considered through written representations. Further hearing sessions will only be scheduled exceptionally.

19.On receipt of this letter, please could the Council upload it into the Examination Library. I am not seeking any comments on this letter from other parties. If the Council has any queries about the content of this letter, please contact me through the Programme Officer.

Yours sincerely,

Helen Hockenfull

Inspector