

Fareham Local Plan 2037

Matter 1 – Compliance with the Act and Regulations - Duty to Cooperate

CPRE Hampshire

February 2022



Inspector's Question 1 – What strategic, cross-border matters have arisen through the preparation of the Plan and what cooperation took place to resolve them

1. Sub-regional cross border issues have been handled for the last 2 decades under the aegis of PfSH – the Partnership for South Hampshire. The market area boundaries within the South Hampshire sub-region were originally based more on what was then PUSH politics and administrative boundaries rather than functional patterns of influence. Thus they included large areas of the rural hinterland in the southern parishes of Test Valley, Winchester and East Hampshire, right up to the South Downs NP boundary. The Solent LEP was subsequently revised to include only whole local authorities, including the New Forest, and PUSH became PfSH with an extended geography to match. Whilst tracts of the rural areas should perhaps always have been excluded, it is probably sensible that Fareham should be wholly included within PfSH.
2. In October 2021, CPRE Hampshire wrote to PfSH asking about public consultation for cross-border housing issues, stating “there is no clear process for public and community involvement”. There has been no confirmation about whether any public consultation will take place, and this has historically been the case.
3. There is a weird “chicken and egg” situation with South Hampshire housing numbers, in that the local authorities say they are waiting on dictat from PfSH about how much housing they need to take, yet PfSH state that they await individual authorities to contribute their housing numbers. Any negotiation takes place behind the scenes via the PfSH POG – Planning Officers Group. No agendas, minutes or information is available to community groups or the public as to the subject or results of any of these discussions.
4. Previous PUSH projections were include in the Spatial Position Statement of June 2016 (<https://www.push.gov.uk/wp-content/uploads/2018/05/PUSH-Spatial-Position-Statement-2016.pdf>). CPRE made the following comments: *“No public consultation has **ever** taken place by PUSH on any of its OAN Calculations (GL Hearn 2014 and update of 2016), and nor has it been examined in public by an independent qualified inspector. CPRE Hampshire has tried on various occasions to open a dialogue on the housing number calculation method but has not succeeded in achieving a meaningful dialogue. The PUSH Spatial Position Statement was produced without any publicly available evidence as to its evolution or methodology. CPRE Hampshire can only surmise that it was the result of private horse-trading between the constituent Local Authorities behind closed doors. CPRE was asked to leave the PUSH meeting when the Spatial Position Statement allocations were agreed.”*

Inspector's Question 2 – Has the cooperation between neighbouring authorities been constructive and proactive?

5. See paras 2 and 3 above. It is not possible for us to know the answer to this question.

Inspector's Question 3 – What specific actions were identified as a result of dialogues with neighbouring authorities ? What were the outcomes and how did they shape the preparation of the plan?

6. The matter of a South Hampshire Green Belt was clearly agreed as a matter of sub-regional significance, but no notice has apparently been taken in the preparation of this Reg 19 consultation version of the Fareham Local Plan. Conversely the issue

was covered in the previous consultation, but has mysteriously and sadly been lost in the final submission version.

7. In an earlier consultation by Fareham BC in July 2019, there were a number of mentions of a South Hampshire Green Belt, notably in Section 10c regarding the Meon Valley, where it said: “The Council will also be working with PUSH to consider the potential for greenbelt land across local authority areas, and there could be scope for this area to become part of a South Hampshire greenbelt.” As CPRE Hampshire has long campaigned for a sub-regional area of restraint in order to encourage urban regeneration and prevent sprawl, this was very much welcomed at the time. Unfortunately, this did not seem to have been included in either the December 2020 Reg 19 document or the submission Version. CPRE Hampshire considers its exclusion to be a significant wasted opportunity, as the NPPF allows local authorities to designate Green Belt as part of the Local Plan process. It is also very confusing, as it had clearly been agreed that the PFSH authorities were to consider a new Green Belt as part of their forthcoming Statement of Common Ground.

8. It seems this is another example of the chicken and egg methodology of the way PFSH works. PFSH, as a group, says they will examine the options for a new sub-regional Green Belt (Reference Examination Library FBC002, October 2021), but then none of the local authorities actually make any headway in evaluating the proposals, and then PFSH will announce that it is not possible as the Local Plans do not include it. It is therefore not possible to answer how this shaped the preparation of the Plan.

Inspector’s Question 4 – Aside from Portsmouth, have any other neighbouring authorities approached the council with a request to accommodate unmet housing (or employment) needs?

9. See paras 2 and 3 above. It is not possible for us to know the answer to this question.

Inspector’s Question 5 – What process did the council follow in seeking to address unmet housing need from Portsmouth? Has the process been constructive and proactive?

10. See paras 2 and 3 above. It is not possible for us to know the answer to this question regarding process.

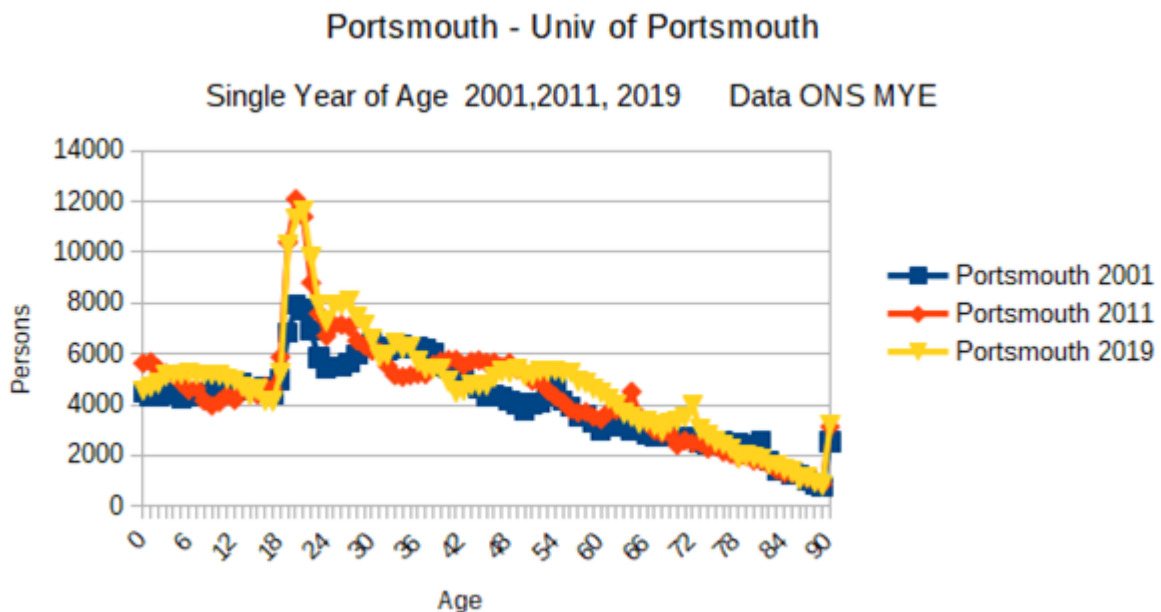
11. However, CPRE Hampshire wrote to PFSH on 22nd October 2021, about Portsmouth’s housing numbers. Our letter is appended to this Hearing Statement. We urged PFSH (para 2 of our letter) to request answers from ONS as to the impact of a review into student housing numbers on Portsmouth and Southampton. There have been challenges to the figures for ONS population projections in around 50 university cities and towns, with a request to the ONS by the Office of Statistics Regulation to investigate. This could have fundamental impacts on Portsmouth and Southampton. Southampton is the 9th most affected city, and Portsmouth the 20th. This will impact upon the duty to cooperate (or any policy that replaces it) as regards to the PFSH Spatial Strategy.

12. Ed Humpherson, Director General for Regulation of the Office for Statistics Regulation, asked the ONS in May 2021 to revisit their projections as they agreed that there had been an error whereby the ONS had possibly overestimated the number of students staying in these 50 cities after their degrees were completed. We do not know if PFSH or Portsmouth City Council employs a specialist demographer, but we asked them both to pursue this with some effort.

13. The discrepancy came to light in Coventry and Guildford when population projections were compared with the following aspects, none of which supported the presumed increase in population/household projections:

- Job growth
- Gas and electric use
- Voter numbers
- School admissions
- Pension & benefit claims
- Car registrations
- A&E attendance
- Household waste

14. In Portsmouth the issue is seen when comparing the total population by age and looking in particular at how the 2019 estimates from ONS (yellow) compare with the actual results from 2001 and 2011 (blue and red) via the Census. The yellow line shows a bulge, indicating more 24 to 28-year-olds than are seen in the census figures. This effect is more clearly seen in those university cities ranking higher than Portsmouth at 23rd in the impact list. It is likely that these are students (possibly foreign) who have not been “counted out” at the end of their studies.



15. In Portsmouth births in 2019 were 484 lower than the projections would have indicated, and deaths were conversely 172 higher. Overall this leads to a discrepancy of some 656 over just one year. Over a 20 year period this alone could lead to an overestimate of 13,120 people.

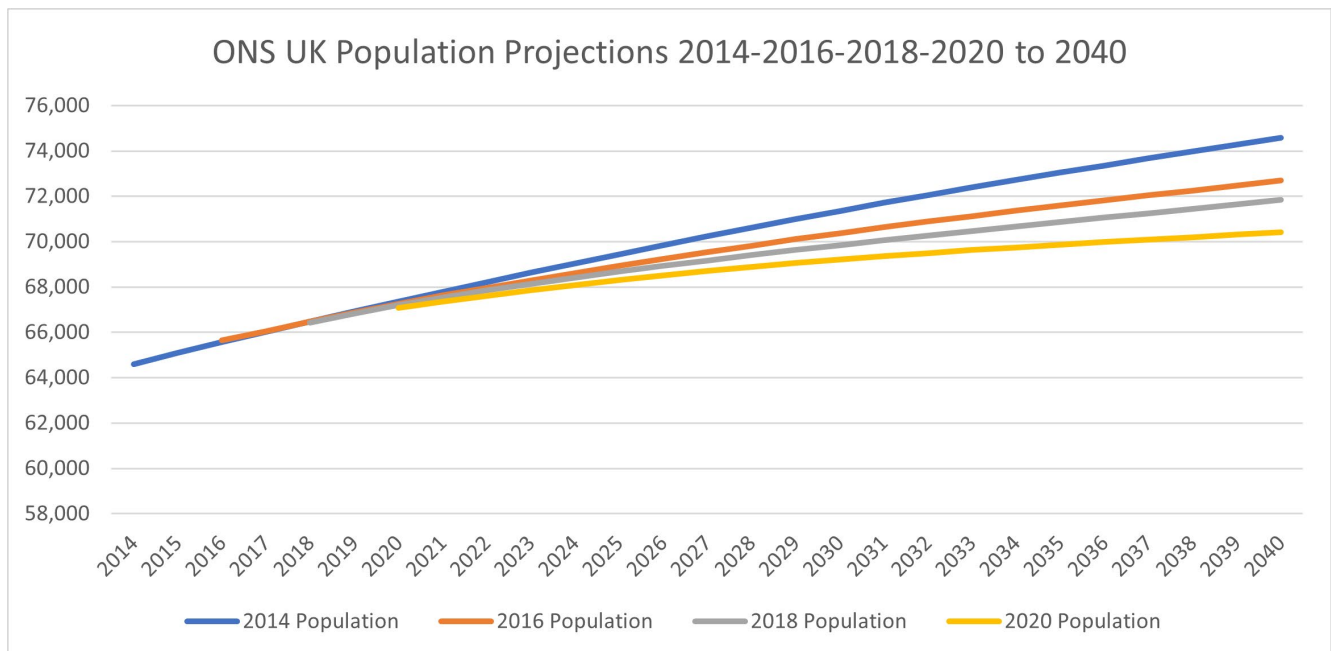
Inspector’s Question 6 – In collaboration with PfSH, what process is the Council following to seek to address the unmet housing need in the sub-region?

16. See paras 2 and 3 above. It is not possible for us to know the answer to this question.

17. However, CPRE Hampshire wrote to PfSH on 22nd October 2021, about housing numbers in the sub-region. Our letter is appended to this Hearing Statement. We

urged PFSH (para 1 of our letter) to seek early release of the Census population and household figures before decisions are made that are difficult to reverse. This would enable ground-truthing of the 2018-projections, as compared to the 2014-projections, to evaluate whether the most recently indicated lowered population growth was real. We believe that the results of the 2021 census, plus the impacts of Brexit and Covid will only confirm that the recent ONS work has more validity than that previously done by MHCLG, and that much of South Hampshire will see reduced population and household projections.

18. On 12th January 2022 the ONS released nationwide population projections, which show a considerable reduction in population over the forthcoming decades when compared to previous estimates. The graph below shows the 2020-projections (yellow) are significantly below the 2014-projections (blue). The importance of this is that the standard methodology is currently using out-of-date figures. The graph below is similar to the graph we supplied in our response of 30th July 2021 and covering Fareham only, numbered Graph H1_1, but we do not yet have the local authority data for Fareham to revise Graph H1_1. But there is no reason to assume that Fareham and the sub-region as a whole will not exhibit the same pattern of reduced growth.





CPRE Hampshire
Winnall Community Centre
Garbett Road
Winchester
SO23 0NY

Tel: 01962 841897
Email: admin@cprehampshire.org.uk
www.cprehampshire.org.uk

22nd October 2021

Working locally and nationally for a beautiful
and living countryside

FAO: swoodward@Fareham.Gov.UK
CC: Paddy.May@portsmouthcc.gov.uk

PfSH Statement of Commor. _____
Agenda Item 11 Joint Committee 25th October 2021

Dear Sean,

As you know we have always taken a keen interest in PfSH and its strategic planning policies including the process of housing number allocations.

We had a few questions about Agenda Item 11 for next Monday's PfSH meeting and wanted to ask if you could raise them with your fellow members and their planning officers.

1. We recognise PfSH authorities are now forced by the current NPPF Standard Method to use housing numbers based on 2014-based household projections. CPRE Hampshire fundamentally rejects the use out-of-date projections, and has urged the Government at all levels to use the latest projections from 2018. We believe that the results of the 2021 census, plus the impacts of Brexit and Covid will only confirm that the ONS work has more validity than that previously done by MHCLG, and that much of South Hampshire will see reduced population and household projections. At the bottom of this letter is a graph showing comparison of the Standard method using 2014 and 2018 projections.

Could PfSH request early release of the Census population and household figures before decisions are made that are difficult to reverse?

2. There have been challenges to the figures for ONS population projections in around 50 university cities and towns, with a request to the ONS by the Office of Statistics Regulation to investigate. This could have fundamental impacts on Portsmouth and Southampton. Southampton is the 9th most affected city, and Portsmouth the 20th. This will impact upon the duty to cooperate (or any policy that replaces it) as regards to the PfSH Spatial Strategy.

Could PfSH request answers from ONS as to the impact of this review on Portsmouth and Southampton?

3. We note that Agenda Item 11 includes the 35% uplift for Southampton, and included a number of comments about the obligation for local authorities to help their neighbours, but we were disappointed to see no mention of the statement made by the Secretary of State at the time he announced the uplift, that it was to be expected that the affected cities would accommodate the uplift within their urban envelope.

Please can PfSH ensure that this is taken into account?

4. CPRE Hampshire believes that one of the most fundamental ways of combating the likelihood of adverse climate change, is to plan development where it can use better public transport and be less reliant on the car. It is important that development does not just respond to climate change, but more importantly how spatial planning can help prevent it. According to Camilla Ween, Harvard Loeb Fellow, speaking on behalf of Transport for New Homes “Transport is responsible for about 26% of greenhouse gas emissions, much arising from personal car journeys. Our society will not be able to achieve the UN goals if we do not change the way we travel; that means we need to create new communities that are NOT car dependent. That means careful consideration of where new development is located, as well as how we design new communities, for example, places that are well connected with high quality public realm and movement infrastructure that encourage people to want to move to a car-free lifestyle.” We would hope it to be a fundamental tenet of the PfSH SoCG that NO development should be permitted that relies on the car as its main means of access.

Please can PfSH ensure that Climate Change is at the heart of its spatial planning policies?

5. Nothing less than a drastic change to spatial strategy and a move away from South Hampshire’s historic pattern of sprawling suburbs will enable any meaningful contribution to the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that have become entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture. The adoption of a South Hampshire Green Belt would assist this by encouraging urban redevelopment and preventing sprawl into the countryside where modal change to walking, cycling and public transport is very much more difficult to achieve. It would also maintain the settlement pattern before it is further degraded. We are encouraged to see that the PfSH authorities are continuing to consider a new Green Belt and look forward to the report in due course.

Please continue your work to include a Green Belt in PfSH spatial planning work!

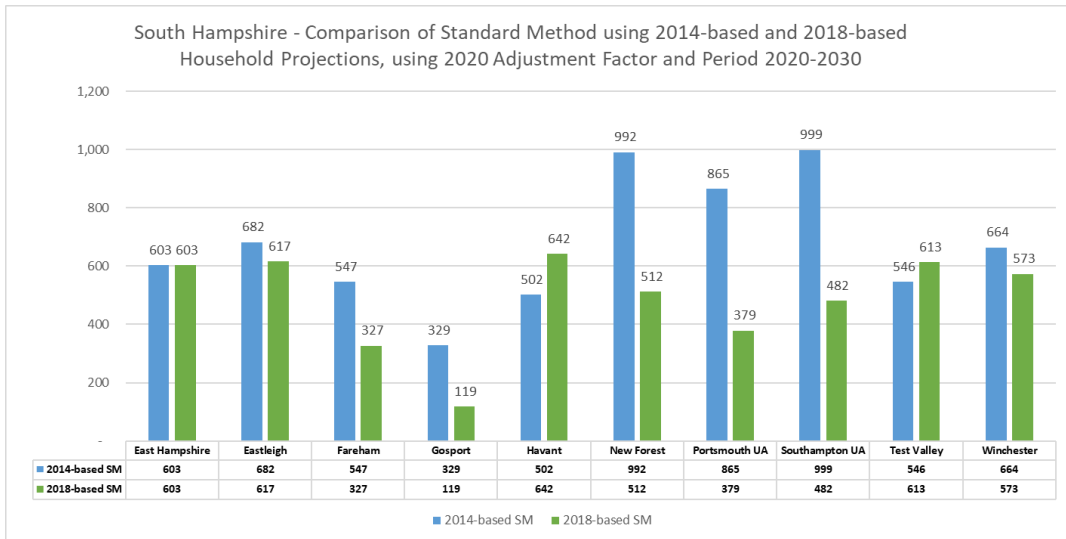
6. It is clear that work continues apace behind the scenes, specifically on the SDOAs. However, there does not appear to be any indication of their proposed locations, apart from Southleigh and the Mayflower Quarter. And there is no clear process for public and community involvement.

Where are the proposed SDOAs and when will a public consultation be held to review the issues and options under consideration by PfSH?

As always, we remain keen to work with PfSH, and look forward to hearing from your officers.

Kind regards, Dee Haas

Chairman



Note: does not include the 35% uplift for Southampton, and covers whole districts for East Hampshire, Winchester, Test Valley, New Forest.