

Fareham Local Plan 2037

Matter 3 – Housing Need and Supply (Policy H1)

CPRE Hampshire

February 2022



Inspector's Questions 1 to 8 – Housing Requirement

Much of relevance to Matter 3 has been covered in our Hearing Statement for Matter 1, so we have decided not to duplicate it here. We hope that you are content that our previously stated evidence in Matter 1 and our associated arguments can be raised under Matter 3. If not we can review this Hearing Statement to include some duplicated text.

Inspector's Question 1 – What is the justification for the conclusion in para 4.3, that the Plan should not plan for a higher level of housing need than the standard method LHN suggests?

1. CPRE Hampshire would support Fareham BC in their conclusion in Para 4.3 that the Plan does not need to accommodate a higher need than the current standard method. We believe that the evidence from later population and household projections all support the likelihood that Fareham's household numbers will turn out to be much lower when the 2021 Census figures are released. Indications from the Secretary of State point to a levelling up agenda which will see more housing in the north and the midlands of England and less in the already overheated and overcrowded south-east. If those statements are followed up by policy changes in the next revision of the NPPF, then it is likely that Fareham will see a lower housing need than the current Submission Plan suggests. The same will likely be true for other South Hampshire authorities, although possibly not Southampton if the 35% uplift is maintained.

Inspector's Question 2 – Has the council been asked if it can accommodate any unmet housing needs from any other housing authorities within the HMA?

2. As matters such as this are not discussed in the public domain, we do not know the answer to this question.

3. However, as regards any unmet needs from other local authorities with the Housing Market Area, which we assume to mean the eastern portion of the PfSH area, we would argue that the numbers for all authorities are likely to decrease. At the moment Havant has withdrawn its plan, but by the time it prepares its next draft, the revised NPPF may have been released. Southampton have stated that they are able to meet their own needs within their local authority area, and whilst they are in the western portion of the PfSH area, this means that other local authorities such as Eastleigh and Winchester are not asked to take any of their housing, and thus not transferring their own need onwards.

4. We see statements about Strategic Development Opportunity Areas in the PfSH meeting agendas on the forthcoming Statement of Common Ground, but no further information is available in the public domain.

Inspector's Questions 3 and 4 – The SoCG with Portsmouth suggests their unmet need is now 800 dwellings, not 669 as identified in para 4.5 of the plan. What is the current position? Should a contingency of 11% should be added?

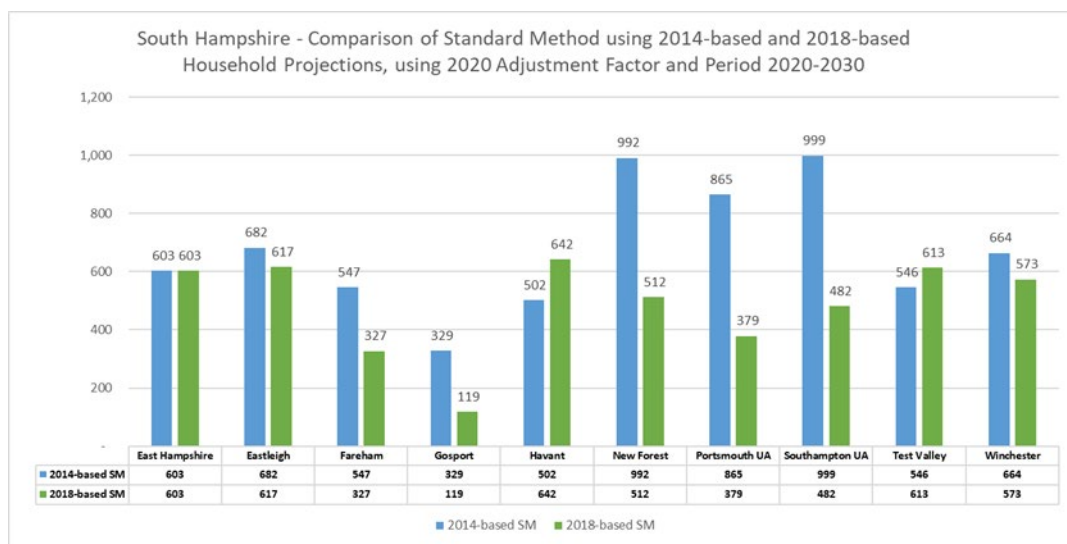
5. We do not know the current position, but as regards Portsmouth's requests to take their unmet need, we would urge Portsmouth CC to look again at their own case and investigate the student numbers issue that we discussed in Matter 1. There is opportunity in the current NPPF to plead special circumstances in any case. The

Department for Levelling Up, Housing and Communities recently confirmed: “Councils, not central government, set their own housing targets in their local plan. Our guidance should be considered alongside local constraints, including the need for infrastructure to support new development, and consideration for the environment.”

6. We do not believe a contingency should be added for the above reasons.

Inspector’s Question 6 – Given the current suggested unmet need for the sub-region of 10.750 dwellings, should the plan make a greater contribution to meeting those needs?

7. CPRE Hampshire does not agree that the sub-region really has a short-fall, it is just based on out-of-date household projections from 2014. The graph below compares the standard method outcomes from using the 2014-projections (blue) and the 2018-projections (green). It is clear that most of the authorities see a considerable decrease in Local Housing Need. All indications are that the 2020-projections, and the forthcoming 2021-Census will confirm that this is the case.



Inspector’s Question 7 – Will the level of housing growth proposed be sufficient to support the economic growth expectations of the plan and wider sub-region?

8. Since the time of the South-East Plan there has been a contradiction in any South Hampshire plan with assuming that economic growth can only be achieved by importing a more skilled workforce, and overall GVA targets were used as the target. This of course does not necessarily lead to a better outcome in terms of per capita growth and productivity. Indeed, importing a better skilled better paid workforce can actually serve to further disenfranchise existing inhabitants. CPRE Hampshire would prefer to see much more emphasis on training the existing UA population, which does not lead to a corollary need for more housing.

Inspector’s Question 8 – Is the Policy H1 to step the housing requirement justified. Does this suppress housing delivery and impact on the plans ability to meet housing needs in the early years of the plan?

9. We assume that this allows for Welborne to come on stream. Since (again we revert to arguments from the South-East Plan) Welborne was supposedly a solution to a sub-regional requirement, rather than being for Fareham’s own needs, then it should not suppress the plans ability to meet local housing needs.