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**Planning Policy,
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Development**

Portsmouth City Council
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Ref: PCC_300721

30 July 2021

Dear Gayle,

Re: Fareham Borough Council - Local Plan 2037 - Portsmouth City Council response

1. Thank you for consulting Portsmouth City Council (PCC) on the Fareham Borough Council (FBC) Local Plan Revised Reg 19 consultation.
2. PCC previously commented on consultation drafts of the FBC Local Plan in February 2020 and in December 2020. The position of the two authorities on their respective Local Plans has since moved on, particularly with regard to housing need and potential supply in part due to changes in plan period and the Government's confirmed housing need methodology.
3. Portsmouth City Council (PCC) works closely with Fareham Borough Council (FBC) as a fellow member of the Partnership for South Hampshire (PfSH), through the Solent Transport partnership, and as a neighbouring planning and highway authority. The two authority areas have strong social and economic ties and share an employment and housing market area.

Housing need

4. In response to FBC's amended *Strategic Policy H1: Housing Provision*, PCC's evolving and current position on unmet need is clarified below.
5. The housing need for the new Portsmouth Local Plan (872 per annum) as of June 2021 represents a significant increase over the level set in the adopted 2012 *Portsmouth Plan* (420 pa) demonstrating the comprehensive and proactive search for housing capacity undertaken to date. However, given the scale of the likely shortfall and the city's constraints on developable land it is extremely likely that PCC will not be able to meet its own Local Housing Need.
6. PCC published a *Housing and Economic Land Availability Assessment* in February

2019 which showed a shortfall in the potential housing supply capacity of the city of some 2,800 dwellings over the plan period. Following a further review of the potential supply, including potential strategic site options and their delivery rates during the plan period, the preparation of the 2021 HELAA shows that there is a current shortfall of around 750 dwellings for the plan period to 2038. However, the scale of unmet need is expected to continue to change (and likely to increase overall) as the plan progresses taking into account new planning permissions, any under delivery against the government's housing need targets and refinement of the draft strategic site allocation's proposals and likely implementation rates, as well as any secured delivery through the Duty to Co-operate.

7. The City Council therefore welcomes FBC's inclusion of an identified contribution to unmet need of neighbouring authorities of 900 dwellings (increased from 847) in its Local Plan Housing Requirement (Table 4.1), inclusive of a delivery buffer, with the acknowledgement of PCC's previous requests to include a proportion of its unmet need in the Local Plan housing supply; the reference to the likelihood of Gosport Borough Council having significant unmet housing need is also noted.
8. In the absence of an updated position statement on the distribution of housing between the PfSH Authorities whilst this work is currently underway, PCC's *Regulation 18 Local Plan consultation draft* (approved by Cabinet on 27th July 2021) indicates a possible contribution of 1,000 units from other local authorities as a 'placeholder' while Duty to Cooperate discussions continue and as Portsmouth's final unmet need housing figure is being determined.
9. Although some neighbouring local authorities in the Housing Market Area have already indicated that they would not have the capacity to meet the city's unmet need, PCC does recognise that Fareham Borough is not the only location where its unmet need could potentially be accommodated within the sub region. This shows the importance of the work being carried out by PfSH on the distribution of unmet housing need in the sub region, including the preparation of Strategic Development Opportunity Area work, which will help to guide the location of future development in the sub-region and form the basis of both Statements of Common Ground between individual Local Authorities and PfSH.
10. PCC therefore retains its request to Fareham BC to take a proportion of its unmet housing need given the strategic cross boundary connections with the housing market area and its geographical proximity and welcomes the recognition of this within in the Fareham Local Plan 2037 housing supply. We would request that all deliverable supply options for the plan period have been fully explored given the scale of unmet need indicated by PCC and Gosport BC and that further discussions are held on the apportionment of dwellings to be allocated to Portsmouth's unmet need.

Housing Allocation Policies

11. PCC notes and welcomes the inclusion of Land West of Downend Road and Land South of Longfield Avenue allocation, which was removed from the November 2020 Reg 19 consultation document in view of the Government proposals for a lower housing target for Fareham, ahead of the confirmed methodology. The Land West of Downend Road allocation is particularly well located in principle for helping to accommodate Portsmouth's unmet need given its geographical proximity to the city

and transport links via the M27/ A27, Portchester railway station and the proposed Bus Rapid Transit (BRT) line.

Employment

12. PCC notes the FBC's amended approach to office space need, based on labour demand to set a more positive, 'aspirational' target instead of past take up used for industrial floorspace need projections, following the recommendations of the 2021 Stantec study of employment need for the sub region. The inclusion of additional smaller employment sites to ensure flexibility and deliverability, instead of relying on significant provision from two strategic sites, is supported.
13. The overprovision of employment space for the plan period is noted. PCC has no objection to this approach to setting employment land forecasts for the plan period given the need for flexibility and choice in delivery and to ensure employment opportunities are retained locally and to lessen out-commuting which may impact on sub regional travel patterns.
14. PCC will continue to work with FBC through PfSH to identify sufficient space for any unmet regional employment need, including locations for strategic distributions sites where there is an identified need.

Working Together

15. PCC is keen to continue to work with FBC on cross boundary strategic planning issues, in both the production of a review of the PfSH Spatial Position Statement and a Statement of Common Ground for strategic planning matters, including the distribution of housing need and the complexity of movement and travel patterns with Housing Market Areas which Government's Standard Methodology for assessing Local Housing Need does not capture. Both pieces of work are currently on-going but the Council is keen to reflect the ongoing collaborative work in formal Statement(s) in due course.
16. Previous Duty to Co-operate conversations and consultation responses have captured the importance of working together on issues that affect PCC and FBC; the landscape value of Portsdown Hill which spans the councils' boundaries; the size and timing of new residential development that may impact on education provision; safeguarding of key transport links; consideration of proposed Green Infrastructure linkages; the sub regional approach to nitrate mitigation and any forthcoming biodiversity net gain requirements.

Yours sincerely,

Rachel Cutler

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