

Statement of Common Ground

Fareham Borough Council &
Havant Borough Council

September 2019

Representations

This Statement relates to the following representations received in response to the Pre-Submission Draft (Regulation 2019) Havant Borough Local Plan (HBLP) consultation:

Respondent no.	Respondent name	Comment no.
R286	Fareham Borough Council	C01-C03

Introduction

This Statement of Common Ground (SoCG) is a jointly agreed statement between Fareham Borough Council (FBC) and Havant Borough Council (HBC) in relation to the Pre-Submission Draft Havant Borough Local Plan 2036 (HBLP) and the representations submitted by Fareham Borough Council (respondent no. 286) in response to that consultation.

A Plan has been provided at Appendix 1 which shows the location and administrative areas covered by the statement. Though not a neighbouring authority to Havant borough, FBC is a fellow member of the Partnership for South Hampshire (PfSH) and falls within the same Housing Market Area as Havant (which includes Portsmouth, Gosport, East Hampshire and eastern parts of Winchester and Fareham).

This Statement should be read in conjunction with the Statement of Common Ground (SoCG) between HBC and the rest of the PfSH authorities which details how HBC and FBC have collaboratively worked with their partner authorities to plan for future development in the sub-region. It also sets out the background to the partnership and the PfSH Spatial Position Statement which is considered in detail below.

Background

The Councils have held regular cross boundary meetings in the formulation of the HBLP 2036, as well as continuing to work collaboratively through PfSH. FBC and HBC have worked to positively and proactively address cross boundary planning matters through PfSH, including the preparation of the 2016 Spatial Position Statement (SPS) over several years.

The two authorities recognise the importance of working together both being part of the Portsmouth HMA which includes the eastern part of Fareham and the whole of Havant. Whilst the evidence for the HMA within the PfSH area was prepared under the 2012 NPPF, it is agreed that the HMA remains relevant for the purposes of the duty to cooperate.

As set out in the SoCG between HBC and the rest of the PfSH authorities, the 2016 SPS sets out the agreed housing distribution (H1) across Hampshire and the Isle of Wight based on the capacity of different areas within PfSH to accommodate housing need. However, this has been superseded with the publication of the Government's standard housing need methodology set out in the 2019 NPPF and work has commenced on the review of the SPS.

PfSH authorities are at various stages of reviewing their local plans, with Havant being the first authority in the Portsmouth HMA to submit a plan for examination, outside of the transitional arrangements for the revised NPPF.

FBC are also preparing a new Local Plan. FBC consulted on a Draft Local Plan (Regulation 18) in late 2017, and more recently ran an issues and options consultation in June/July 2019 following the publication of the Government's standard methodology. A further Regulation 18 consultation is scheduled to take place in the autumn or winter of 2019/2020 before the formal publication stage takes place. In addition to comments on various detailed matters, FBC's representations to the Pre-Submission Draft HBLP 2036 raised concerns that Havant is proceeding with its Local Plan before the review of the SPS has concluded, in the context of unmet housing need across the sub-region. The two Councils have subsequently held two cross boundary meetings to work towards agreement on the issues raised.

The following sections set out the agreed matters between FBC and HBC.

The PfSH Position Statement and its review

As set out in the SoCG between HBC and the rest of the PfSH authorities, the Joint Committee resolved to review the Spatial Position Statement on the 15th October 2018. This will bring it up to date and in line with the revised NPPF.

Both HBC and FBC are fully committed to inputting into the review of the PfSH SPS and recognise the importance of sub-regional planning and ensuring neighbouring PfSH authorities' housing needs are met where they cannot accommodate their own.

The SoCG between HBC and the rest of the PfSH authorities recognises the importance of local authorities' having up to date local plans and supports authorities proceeding with local plans before the SPS review has concluded. It also sets out the Pre-Submission Draft HBLP 2036 has maximised the potential for housing within Havant Borough, so far as sustainable development can still be achieved. Given the strong economic links between Havant and Portsmouth, it is also agreed that any buffer from the Borough's proposed housing supply in addition to the Borough's identified need, should contribute towards Portsmouth City's unmet housing need within the wider Housing Market Area.

A separate SoCG between HBC and Portsmouth City Council has been agreed between those parties which sets out the following agreed proposed change to paragraph 2.49 of the supporting text in the Pre-Submission HBLP 2036 (new text to be inserted is shown by underlining):

"Table 2 shows that there are sufficient sites to provide 10,231 net new homes across Havant Borough from 2016 up to 2036. This will address the objectively assessed need for housing and provides a buffer of 971 homes. Providing a buffer is necessary to ensure that the Plan is sufficiently flexible to accommodate needs not anticipated in the Plan and to allow a rapid response to economic changes in accordance with the NPPF. The development strategy in this Plan maximises the potential for housing delivery which will enable the Borough to address some of Portsmouth City's unmet housing need in the context of the wider Housing Market Area."

Notwithstanding the above, both HBC and FBC recommend that the Inspector should invite an independent representative from PfSH to make a written statement or appear at the Examination Hearings advising the Inspector of recent progress and current position in respect of unmet need.. This will enable the Inspector to examine the progress which has made on the review of the SPS to date, including how housing needs can be met in the event that PfSH partner authorities are not able to accommodate their own.

Windfall

FBC have highlighted that there is a discrepancy in the windfall figure as a source of supply in Figure 2 of the Pre-Submission Draft HBLP 2036. It is agreed that this should be updated prior to the submission of the Plan to ensure that any windfall allowance is excluded from the first five years of the Plan, based on any update to the Council's Windfall/Unidentified Housing Development¹ paper.

¹ [Windfall/Unidentified Housing Development Analysis and Justification Background Paper](#)

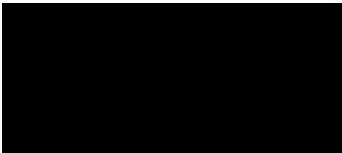
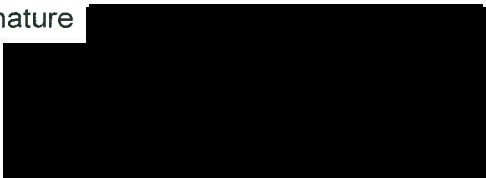
Strategic Policies

FBC have raised concerns that it is unclear which policies are 'strategic policies' in the Pre-Submission Draft HBLP 2036 which is a requirement of the NPPF (2019), paragraph 21. HBC proposes to clarify that the following policies are 'strategic' within an Appendix to the Plan.

Summary

Subject to the Inspector for HBC's Local Plan receiving an update on the progress of reviewing the PfSH Spatial Position Statement, either by written statement or a representative from PfSH appearing at Havant's Local Plan Examination, FBC has no outstanding concerns in respect of the HBLP 2036.

Signatories

This statement has been prepared and agreed by the following organisations	
Havant Borough Council	Fareham Borough Council
Signature 	Signature 
Simon Jenkins	Name RICHARD JOLLEY
Director of Regeneration and Place	Title DIRECTOR OF PLANNING AND REGENERATION
Date : 19 th September 2019	Date : 27th SEPTEMBER 2019

Appendix 1: Map of administrative areas

