

Sent by email to: planningpolicy@portsmouthcc.gov.uk

28/09/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Portsmouth City Council Local Plan Issues and Options consultation

Thank you for consulting the Home Builders Federation (HBF) on the Local Plan Issues and Options. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Duty to co-operate

We are concerned that whilst the Council has worked with its partners authorities in preparing the PUSH Spatial Planning Position Statement there has been a collective inability to ensure that the unmet needs of Portsmouth and the HMA are met. The NPPF is clear that housing needs should be met in full. There will need to be clear and reasoned justification as to why these needs are not being met if any future Plan is to be found sound. As such whilst there would appear to be some mechanism in place for planning across Local Planning Authority (LPA) boundaries in order to address strategic issues, further work needs to be done to ensure that the outcomes of this co-operation leads to housing needs being met. Given that Portsmouth are in the early stages of this review there may be opportunities for preparing a joint Local Plan with neighbouring authorities. We note that Gosport and Havant are also in the process of reviewing their Local Plans and as such there is clearly the opportunity for the preparation of a combined Local Plan covering these authorities.

Housing Needs

The Council have identified their housing need between 2011 and 2034 as being 740 dwellings per annum (dpa). This is based on the 2012 based Sub National Population Projections (SNPP) and Household Projections (HHP) with a slight uplift to take account of concealed households that would not have been represented in the demographic starting point. We would agree with the Council's use of this data as the starting point for determining OAN, however consideration must be given as to whether there has been any meaningful change resulting from the updated projections published in 2016.

We would not wholly disagree that the market signals in Portsmouth are not indicative of an area where there is significant levels market suppression requiring a substantial uplift. Values are below both regional averages and its neighbouring authorities. However, since 2013 the lower quartile house price to income ratio has been increasing rising from 6.41 in 2013 to 6.90 in 2015, the highest it has been since 2008 and the high levels of overcrowding suggest that a reasonable uplift is required. This position would also be more in line with the Government's recent consultation on the standard methodology for housing needs which indicates Portsmouth's OAN as being 840 dpa. Whilst this can only be afforded limited weight it does provide a reasonable indication of the government's direction of travel on this issue.

In addition to these market signals the Council have identified that the need for affordable housing surpasses that for market housing despite the City being one of the most affordable places to live compared to the rest of the HMA. However, this does not seem to have had an impact on the level of housing needs. Planning Practice Guidance states in paragraph 2a-029 that:

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."

We would suggest that the Council needs to consider a further uplift to improve affordable housing delivery within the HMA. A higher overall housing requirement will enable the delivery more affordable housing in order to meet these needs.

Housing Requirement

At paragraph 5.4 of the Issues and Options paper the Council suggest that the housing requirement will be set on the basis of capacity given the constraints on land facing Portsmouth City Council. Whilst we recognise that there are geographical constraints to meeting housing needs in coastal authorities such as Portsmouth we would expect the Council to try and maximise development in line with the NPPF. However, until the appropriate work in relation to land availability has been undertaken and published we cannot comment on the ability of the Council in meeting its housing needs. As outlined above if the Council cannot meet its own needs then it will need to secure agreement from other authorities in its HMA that they will increase their own delivery to meet Portsmouth's unmet housing needs.

Student Accommodation

We would suggest that the Council takes a more proactive approach to managing dedicated student accommodation within the Local Plan. In particular the Council needs to ensure that the impact of student housing on infrastructure is taken into account and the burdens not placed solely on the house building industry. With regard to the monitoring of student accommodation we would agree with the Council's current position in which Student Accommodation is monitored separately to market housing.

Should the Council choose to monitor the potential for this to bring market housing back into this must be based on evidence to show that the number of existing houses in student accommodation has fallen in line with the provision of purpose built units. Increasing student numbers, or lower levels of occupation in student housing, would mean that any expected gains from existing stocks are not seen.

We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be placed on your consultee database and receive updates on any further consultations with regard to the emerging Local Plan.

Yours faithfully

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