

Sent by email to: localplanconsultation@fareham.gov.uk

26/07/2019

Dear Sir/ Madam

Response by the Home Builders Federation to the Local Plan consultation

Thank you for consulting the Home Builders Federation (HBF) on the latest consultation the Local Plan. 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.

Meeting housing needs

It is essential that the local plan being prepared for Fareham not only meet its housing needs but also considers the degree to which it can meet the housing needs of its neighbours in the 'PUSH' area. In particular we note that Portsmouth are preparing a new local plan and have identified the struggle they may have in meeting housing needs given the tight boundary of the City to the urban area. It will be important for authorities such as Fareham to consider how any unmet needs arising in neighbouring authorities will be addressed. Both paragraphs 11 and 60 of the National Planning Policy Framework (NPPF) make it clear that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for and, therefore, it is not sufficient to note the issue but then fail to address it.

The Council have stated on page 3 of the consultation document that a suitable buffer is required to ensure the local plan housing requirement is met. We would agree with this statement and would suggest that a 20% buffer is the minimum required to ensure delivery. Such a buffer will provide the necessary certainty to secure delivery against delays in the delivery of any allocated sites. A 20% buffer will also ensure that the Council will be able to maintain a five-year land supply across the entire plan period and avoid the local plan being considered out of date on the basis of paragraph 11 footnote 7 of the NPPF.



Site allocations

The HBF does not comment on specific allocations but it is important for the Council to consider the type of site it allocates and the impact they have on local plan delivery trajectories. Allocating a number of larger sites to meet the majority of an area's housing needs will tend to see more development at the end of the plan period and delay meeting the current needs of an area's population. As such we would recommend that a wide range of sites are allocated, both in terms of size and location, to ensure that delivery is consistent across the plan period. In particular, the Council will need to allocate, as required by paragraph 68 of the NPPF, sufficient small sites of less than 1ha to meet 10% of their housing needs.

Infrastructure

The Council will need to ensure there is sufficient infrastructure in place to support new development. At present the Council has placed a moratorium on new development as a result of insufficient water treatment infrastructure and the impact of nitrate deposits on the Solent. Whilst we consider the impact arising from residential development to be minimal and insufficient to warrant such a moratorium it is vital that the Council ensures that it has the necessary infrastructure in place to support the proposed levels of development in its area. Development should not be put on hold due to the failure of the local authority and statutory infrastructure providers to ensure sufficient infrastructure is in place.

Ensuring good design

The Council states that it wants to ensure that any new homes provided are adequate for its occupants and is proposing to adopt nationally described space standards. The HBF and our members also aim to deliver quality homes that meet the needs of our customers. However, we consider that in some circumstances high quality homes can be provided below the minimum space standards and that such homes meet many people's needs. The standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. Essentially it could mean that those families requiring a higher number of bedrooms will have to pay more for a larger home.

The HBF in partnership with NHBC undertake a Customer Satisfaction Survey annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their home builder to a friend. The results of the 2017/18, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This

does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided.

The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. We would therefore suggest that there needs to be compelling evidence that a significant proportion of homes are being built well below space standards for the NDSS to be adopted.

Self-Build and Custom Housebuilding

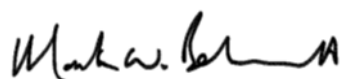
As we stated in our response to the 2017 consultation on this local plan the Council cannot look to meet the needs of self-builders solely through the sites of housebuilders. These sites will already provide affordable housing and with the loss of plots to self or custom house builders will further reduce the number of market homes that will provide the necessary return to ensure development of a site. Planning Practice Guidance makes it clear that Councils must consider a range of approaches to meeting the needs of self-builders including using their own land and engaging with landowners with suitable sites and we would suggest these approaches must be used prior to placing requirements on housebuilders.

Whilst we recognise that part of the justification for the inclusion of such a policy in the local plan is the self-build register caution must be taken with such registers. Paragraph 2a-017 requires Councils to assess and review data held on registers to ensure that the evidence remains accurate. In addition, paragraph 57-011 of PPG considers it necessary to additional data to understand the need for this type of housing in future and to make reasonable assumptions to avoid double counting. As such the Council must ensure that those on the register are realistically able to or are truly interested in building their own home. At present the approach taken to self-build registers can inflate demand for self-build plots. The Council must be certain that those on the register are able and willing to build their own home.

If a policy requiring the provision of self-build plots is included within the local plan, then it must allow for the return of any unsold plots to the developer after a reasonable period of marketing. We would recommend that this period should be no more than six months. If there is the level of demand suggested by the Council for such plots in the Borough there should be no requirement for a longer period.

We hope these comments are helpful and if you would like to discuss these issues further please contact me.

Yours faithfully



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