

Sent by email to: [planningpolicy@fareham.gov.uk](mailto:planningpolicy@fareham.gov.uk)

27/02/2020

Dear Sir/ Madam

## **Response by the Home Builders Federation to the consultation on the Fareham Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the supplementary consultation on the Fareham 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.

### **Housing need and supply**

We agree with the Council local housing needs assessment and welcome the decision to plan for a buffer of between 10% and 15%. This will provide some security against delivery not being as expected by the Council. However, we would advise that a 20% buffer would provide a more appropriate degree of security and ensure housing needs will be met in full. Similarly, we welcome the recognition that the Council may have to address the unmet needs of its neighbours within the Portsmouth Housing Market Area. The City of Portsmouth in particular is constrained by a tight boundary to its urban edge and will more than likely require support from its neighbours such as Fareham.

Whilst we can see some benefits to the proposed policy that would promote further development outside the urban boundary should the Council not have a five-year supply of housing, we are concerned that the Council could use this to limit the application of the presumption in favour of sustainable development. Paragraph 11 of the NPPF is clear as to how Council's should approach decision making where policies are out of date and the Council should not be seeking constrain its decision making in such a situation. As currently written, we do not consider the proposed policy to be sound.

### **Small scale development outside of the defined urban area**

The inclusion of such a policy is to be welcomed but the Council will need to identify sufficient small sites on which 10% of their housing supply will be delivered. Paragraph 68 of the NPPF is clear that such sites must be identified in the development plan or



the brownfield register. The proposed policy will undoubtedly support the delivery of small windfall sites but alongside this policy we would advocate the allocation of small sites wherever possible to provide greater certainty to SME house builders.

### **Internal space standards**

If the Council is considering adopting any of the optional technical standards in the Fareham Local Plan the Council will need to ensure that they provide the necessary evidence, as set out in PPG, on the need for such homes and their impact on development viability to support their adoption in the local plan. We note that the Council considers it to be essential to support quality of life and social wellbeing. However, we have some concerns that strict adherence to space standards could limit well designed and more affordable smaller homes that better meets the needs and budgets of some households. As such there must be clear evidence to show that there has been evidence that a significant proportion of new homes are coming forward well below standards. If such evidence is provided, we would recommend that the policy include some flexibility to allow for the delivery of homes that are smaller than space standards where they are well designed and meet the identified accommodation needs of local households.

### **Conclusion**

We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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