

**Home Builders Federation****Matter 3****FAREHAM LOCAL PLAN EXAMINATION****Matter 3 – Housing Need and Supply****Housing requirement**

*What is the justification for the conclusion in paragraph 4.3, that the Plan should not plan for a higher level of housing need than the standard method Local Housing Need suggests?*

The statement in paragraph 4.3 would appear to relate to affordable housing delivery and the fact that the Council do not consider it necessary to adjust the housing needs figures for the Borough as these needs will be met in full based on the Council current policy and expected levels of delivery. However, the Council have not established how many affordable homes it expects to deliver through this local plan. If the Council cannot meet the need for affordable housing the Council must, as set out in paragraph 2a-024 of PPG, consider whether the total amount of housing delivered through this local plan should be increased to help deliver the required number of affordable homes.

It is also necessary for the Council to consider paragraph 2a-010 of PPG. Whilst this paragraph sets out three examples as to when housing needs may exceed those arrived at using the standard method it is important to note that it is made clear that this not an exhaustive list. Two key issues that FBC must consider in relation to these needs being higher than that arrived at using the standard method are unmet needs from a neighbouring area and whether economic growth expectations are supported by the level of housing established using the standard method.

*Has the Council been asked if it can accommodate any unmet housing needs from other local authorities within the Housing Market Area (HMA)?*

This is for the Council to answer. However, given the ongoing co-operation as part of the Partnership for South Hampshire it should not require for a specific request from an authority with regard to unmet needs before another authority in the same partnership considers their ability to help. The wider shortfall in delivery across the partnership has been evident for a number of years and should have been considered as part of the preparation of this local plan. Therefore, whilst we support the decision to increase supply in response to the unmet needs of Portsmouth the Council should also have considered its ability to address unmet needs from across the PfSH area. There was clearly a shortfall between needs and supply across the area and this should be sufficient for further sites to be allocated where possible.

*The Statement of Common Ground (SoCG) with Portsmouth suggests their unmet need is now 800 dwellings, not 669 as identified in paragraph 4.5 of the Plan. What is the current position?*

The latest consultation on the Portsmouth Local Plan indicated that they expect to be able to deliver 16,933 homes between 2020 and 2038 a shortfall of 708 dwellings against their housing requirement for that period of 17,701 dwellings.

*The above SoCG also suggests a contingency of 11% should be added to the 900 dwellings. Is this included in Table 4.1 of the Plan?*

Whilst the HBF agree that a contingency is necessary ensure needs are met in full this should be considered through the supply of land rather than within the housing requirement.

*Are specific sites identified to meet Portsmouth's need? If so, which sites and are they located within the Portsmouth HMA?*

This is for the Council to answer.

*Given the current suggested unmet need for the sub region of around 10,750 dwellings, should the plan make a greater contribution to meeting these needs?*

Yes. As outlined above the Council were aware of the level of unmet needs across the PfSH area as they were preparing this local plan and should have considered and tested the ability of FBC to support a higher housing requirement. Whilst we recognise, as the Council note in paragraph 4.4 of the Local Plan, that due to different authorities being at different plan making stages, it was not possible to identify the precise level of unmet needs, this should not have been a barrier to the Council doing more to ensure that the needs of the PfSH area would be met. Given the scale of the unmet needs across the sub region and the constrained land supply in the neighbouring Borough of Portsmouth and Gosport it should have been self-evident to the Council that it needed to consider and test the potential to deliver a higher housing requirement than that that set out in policy H1.

*Will the level of housing growth proposed be sufficient to support the economic growth expectations of the plan and the wider sub region?*

There does not appear to be any evidence presented as to whether the housing requirement is sufficient to meet the jobs growth expectations of the Borough. Such an assessment is essential to ensure that there is sufficient housing growth to support the economic expectations over the plan period. If there are insufficient homes to meet the expected level of jobs growth in the area it will be necessary for the Council to consider whether the requirement should be increased.

Is the proposal in Policy H1 to step the housing requirement justified. Does this suppress housing delivery and impact on the plans ability to meet housing needs in the early years of the plan?

PPG establishes that were appropriate stepped housing requirement can be used but that this should not unnecessarily delay meeting identified development needs. However, in arriving at this position, the Council should have considered strategies or additional allocations that would allow for the delivery of housing at a consistent rate across the whole plan period.

### **Affordable housing requirement**

What is the annual net need for affordable housing in the borough? For clarity for decision-makers, developers and local communities should the need for affordable housing be clearly set out in the Plan?

It would be helpful to set out what need is in order to monitor delivery affectively and, if there is a shortfall in delivery, ensure that this is a factor in decisions making.

Has the affordable housing need been correctly established, and is it based on up-to-date information?

The approach taken with regard to the assessment of affordable housing needs does not appear to be consistent with the approach set out in PPG. Paragraph 2a-021 sets out that projections of affordable housing need will need to reflect new household formation and the proportion of new forming households unable to buy or rent as well as an estimate of the existing households falling into need. However, in their response to the Initial Questions the Council set out that the assessment is based on those currently in need of an affordable home based on current waiting lists with needs from newly forming households captured by an allowance of 500 homes to take account of newly forming households who will be in need of an affordable home. However, we could find no evidence as to how the Council have arrived at this 500-home allowance to take account of future growth and whether this is justified.

How does it compare to the housing requirement?

Based on the requirement in the local plan the level of affordable housing need is roughly 37% of the housing requirement.

Based on the requirement for qualifying developments to provide affordable housing as set out in Policy HP5, how many affordable homes is the Plan expected to deliver?

For Council.

How does this compare to the identified need?

For Council.

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