



Home Builders Federation

Matter 4

FAREHAM LOCAL PLAN EXAMINATION

Matter 4 – Housing Policies

Policy HP2 Small Scale Development Outside the Urban Areas

Should the title of the policy include the word housing for effectiveness?

It would seem to be an appropriate modification to provide the necessary clarity as to the intention of the policy.

What is the justification for defining small scale as no more than 4 units?

With regard to defining small sites we would recommend that the Council uses either sites of fewer than 10 houses or sites of less than one hectare. Both these are used in the NPPF and would ensure consistency between the local plan and the NPPF.

On what basis has the requirement for the site to be within a reasonable walking distance to a good bus service been defined in paragraph 5.16 of the supporting text?

No comment.

Policy HP4 Five Year Housing Land Supply

What is meant in part a) that a proposal should be relative in scale to the five-year housing land supply shortfall? Is the Policy effective?

No comment.

The Framework in paragraph 119 seeks to make effective use of land making as much use as possible of previously developed land. Is the policy effective in this regard? Does it give too much emphasis to development outside the urban area?

Where Councils cannot show that they have a five-year land supply, especially following the adoption of a local plan, this would suggest that there is insufficient land in the urban area with which to meet housing needs. As such it will be necessary for

sites outside of the urban area to come forward in order to ensure that needs are met in full.

Does the policy provide sufficient protection to Strategic Gaps?

The application of the presumption in favour of sustainable development, regardless of policy HP4, requires development be permitted where it accords with an up-to-date local plan without delay. This does not remove the requirement for the Council to consider relevant policies in the local plan such as strategic gaps and this policy does not seek to remove those protections. However, it does provide the necessary clarity with regard to how sites in these areas can come forward in order to bolster supply without harming the integrity of the strategic gap.

In part d) of the policy, is it clear to decision makers, developers and the community what is meant by 'short term'. Is this phrase necessary?

There is no need to refer to sites being deliverable in the short term. The NPPF is clear in its definition as to a deliverable site and as such the words short term should be deleted from the policy.

Policy HP5 Provision of Affordable Housing

What is the justification for requiring the different levels of affordable housing provision on greenfield, brownfield and Fareham Town Centre sites? What is this based on, how was it calculated and what alternatives were considered?

For Council.

Does the Viability Assessment and Viability Assessment Addendum demonstrate that the required percentages of affordable housing in different locations is viable across the District, for both strategic sites and small-medium scale sites?

As we note in our representations the viability assessment did not consider the full range of policy costs being placed on development. The Council have addressed these points in the addendum outlining that the additional costs on development from these requirements would be covered by the contingency of £10,000 which formed part of the assessment undertaken in 2019. However, it is notable that this contingency would be reduced to just £345 from these extra costs and as such there is a risk that any further increases in the cost of development are more likely to impact on viability. As such the flexibility mentioned in the supporting text should be set out in policy to make it clear to both developers and decision makers the need for the policy to be applied flexible.

Do the residential appraisals cover an appropriate range of typologies? Do they reflect the size, scale and location of development likely to be delivered by the policies and allocations in the Plan?

No comment.

How has the viability evidence considered the higher costs associated with large scale sites, such as the need for strategic highways infrastructure?

No comment.

Does the viability evidence align with the latest information on the type of highways mitigation likely to be required by the site allocations?

No comment

The supporting text refers to viability considerations which may affect the ability of schemes to provide the required level of affordable housing. To be effective, should the policy provide guidance on viability matters to provide flexibility?

Yes. Whilst we welcome the fact that the Council will consider the impact of its affordable housing policy on the viability of development this must be set out in policy to provide the necessary clarity to be decision makers and applications. Such an approach would ensure that the policy is consistent with paragraph 58 of the NPPF and ensure that there is sufficient flexibility in the policy.

Are the tenure requirements stated in the policy justified and effective? What evidence supports the levels required? Is the social rent requirement contradictory in parts i) and ii)?

No comment

The Policy requires that the mix of property size and type should reflect local need. Where is this assessment of current needs set out in the evidence? Paragraphs 5.40 – 5.42 of the supporting text relates to affordable housing size and mix but refer to open market homes in the first paragraph. Is this effective?

No comment

What is the justification for affordable rent provision to have rents and service charge at no more than 80% of market rent or the relevant Local Housing Allowance whichever is lower? Should this be more appropriately included in the supporting text to explain the application and expectation of the policy?

No comment

Policy HP9 Self and Custom Build Homes

What is the current demand for self and custom-build housing in Fareham? How does Policy HP9 relate to the identified need?

Whilst PPG indicates that other evidence may be required when considering the demand for self-build homes the principal source of information will be the self and custom build register. Table 2 in the Council background paper on this issue (HOP004) indicates that there are 42 individuals meeting the local connection test who are looking to self-build in Fareham. This level has fluctuated slightly but on average the list has seen 41 household looking for self-build housing in each base period. However, what is not clear from the Council's evidence is whether the individuals on the list have changed or whether many on the list have just been rolled forward from year to year. Clearly if the majority of those on the list have just been rolled forward each base year there would appear to be limited demand for self-build homes in Fareham and the requirement in this policy for 10% of homes on sites of more than 40 units will mean that supply is significantly greater than demand.

It is also important to note the Council evidence indicates that sufficient self-build applications were granted permission to meet the needs identified in base period 1 and that as of the 30th of October 2019 a further 24 self-build applications were granted permission. This would suggest that the demand for self-build homes can be broadly addressed through windfall development and that the requirement set out in HP9 is unjustified.

What is the threshold of 40 or more dwellings based on, and what is the justification for requiring 10% of the dwelling capacity to be provided as self-build and custom build plots.?

A 40-unit threshold is relatively low for such a policy which in general tend to be applied to much larger sites in other areas. One key concern with having such a low threshold is that it is impossible to separate the self-build plots from the rest of the site which creates difficulties with regard to health and safety on a site with self-builders working alongside the main contractors delivering the rest of the development. There are also concerns that the self-build sites will take much longer to complete or could be left undeveloped to the detriment on the other residents. Finally, there is a risk that a small site could be largely built out before any unsold plots would return to the developer given the requirement to market for 12 months and then obtain the amendments to the planning application. To return to the site to complete those units creates additional cost to the developer, leaves undeveloped plots on such sites, and could potentially delay the completion and of units on unsold plots and their eventual occupancy.

Is the requirement for plots to be marketed for 12 months justified?

Given the low threshold for those sites required to deliver self-build plots we would suggest that the marketing period is too long. If there is the demand for such plots, then a marketing period of 6 months should be more than sufficient.

Bearing in mind the provision of custom and self-build homes on the Welborne Garden Village and the potential for windfall development, would the application of the policy result in an over provision? Has the potential delivery over the plan period been assessed against the potential need?

As set out above there is clearly potential for this policy to substantially exceed demand for self-build and custom house building lots in Fareham.

Part c) of the policy requires design parameters to be in place. Is it clear who and when these parameters would be prepared and how they would relate to the wider site?

No comment

Is it clear to decision-makers, developers and local communities how the policy will be applied? Is it sufficiently flexible?

No comment.

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