



HAVANT BOROUGH

CORE STRATEGY

EXAMINATION IN PUBLIC

EXAMINATION STATEMENT

Grainger plc

Submitted 23 August 2010

SESSION 4: HOUSING POLICY

GRAINGER PLC REF: 06/0642(B)

Woodcroft Farm



Introduction

This Examination Statement has been submitted on behalf of Grainger plc as part of the Examination in Public on the Havant Borough Local Development Framework Core Strategy (HBCS). The Statement highlights and where necessary expands upon the sustainability representation submitted by Grainger in May 2010 on the Core Strategy process. It does not repeat representations.

Referencing

The representations submitted on the Submission Core Strategy throughout the Examination Statement. The referencing system used to refer these representations is derived from stating the policy, paragraph, appendix or diagram number that representations were submitted, followed by our generic reference number given by the Council – 0642(B).

Abbreviations

- HBC – Havant Borough Council
- SV – Savills (Planning Consultant)
- PPS – Planning Policy Statement
- HBCS – Havant Borough Submission Core Strategy
- SEP – South East Plan

Q. 9. Will the right amount of housing be provided in appropriate sustainable locations?

Amount

- 1.1 Like all Local Planning Authorities within England, Havant Borough has been required to react to the changes to the strategic planning framework and the revocation of the South East Plan. As per the other Local Authorities that make up the Partnership for South Hampshire however, Havant Borough considered, informed and ultimately supported the Policy Framework for the Sub-Region included in the former RSS.
- 1.2 Grainger plc and Savills fully support the Council's decision to proceed with the Examination of its Core Strategy. The HBCS and its objectives, including the numerical housing requirement, has been based on a thorough assessment of economic and environmental considerations, and remains true despite the revocation of the RSS by the Secretary of State.
- 1.3 As per the letter from the Chief Planning Officer, dated 6th July 2010, Local Authorities can continue to pursue the housing requirement set within the former RSS if it so chooses, which in the absence of any evidence base to support an alternative, is the decision made by HBC. Furthermore, this total requirement (6,300 dwellings) does not differ from that proposed by PUSH during the course of the formation of the RSS. In other words, the strategy was not altered by intervention from the EiP Panel or former Secretary of State. In respect of the total numerical requirement therefore, we contend that the strategy adopted by HBC is sound and it is under no obligation to review this position.

Sustainable Locations

- 1.4 As a Borough, Havant is compact with good accessibility to key service centres, strategic road network (A3M and M27) and rail network. In delivering this quantum of development, HBC benefits from a former Hampshire County Structure Plan (Review) and adopted Havant Borough Local Plan Policy, which identifies the delivery of a new community at West of Waterlooville. While the baseline allocation for this Major Development Area (MDA) already benefits from a planning permission, in partnership with Winchester City Council and key stakeholders, HBC is engaged with Grainger and Savills to deliver a new comprehensive masterplan of 2,500 dwellings across both administrative areas. As part of this development some 600 dwellings will come forward within Havant Borough and contribute to the total requirement of 6,300 dwellings during the course of the Plan period.



1.5 Supplementing the MDA, the Council's strategy to identify Woodcroft Farm as a Strategic Allocation within the Core Strategy is fully supported, and has been aided by Grainger's ability to demonstrate deliverability and secure appropriate access arrangements through dialogue with Hampshire County Council. The site can deliver a significant quantum of residential development early in the Plan period, in close proximity to the local service centres within Wecock and the public transport network that exist along Eagle Avenue. Further details on the delivery of the Strategic Allocation are provided in a separate representation concerning the Strategic Sites.

Q.10 Is the housing trajectory realistic; can it be delivered? Will the CS provide a five and ten year housing supply?

2.1 The Council has retained a base, or start year of the Plan period of 2006 as contained within the former South East Plan. Using the details contained within the Trajectory, it is possible to examining the numerical position in respect of supply.

2.2 With an annual average requirement of 315 dwellings per annum ($315 \times 20 = 6,300$) and total completions of 878 dwellings from 2006 to 2009, the Council has a residual annual requirement of 319 dwellings per annum to meet over the remaining 17 years of the Plan period it has adopted ($6,300 - 878 \div 17 = 319$).

2.3 Based on this residual annual requirement, to demonstrate a 5 year land bank, the Council would need to show delivery of some 1,595 dwellings ($319 \times 5 = 1,595$), and over a 10 year period, 3,190 (319×10).

2.4 The Trajectory provided within Appendix 2 of the Submitted Core Strategy provides a breakdown between consented sites, potential sites in the urban area and predicted growth from urban extension sites, for consideration as part of the LDF. Using a base date of April 2009, the following quantum of development is shown within the Trajectory as being deliverable within the 5 year period to 2014:

§ Site's with Planning Permission	964
§ Potential Site's in the Urban Area	829
§ LDF Urban Extension Sites	583

- 2.5 When the identified supply from within the Urban Areas is added to the sites with an extant consent (excluding Windfall), the land supply equates to 5.6 Years ($962 + 829 = 1,793 \div 319 = 5.62$). When the projected completions from sites to be considered as part of the LDF process are factored in, this increases to a supply of 2,376 and a years supply of 7.4 years up to March 2014.
- 2.6 With regard to the 10 Year supply, based on the residual requirement of 319 dwellings, the Council would need to have demonstrated within the Trajectory 3,190 dwellings up to March 2019. As per the Trajectory, the supply totals 4,609, or the equivalent of 14.4 years based on the current residual requirement of 319 dwellings per annum.
- 2.7 While it will be for the Local Authority to set out the basis for it's trajectory, the data contained within points to the ability to deliver both a 5 and 10 year land supply.
- 2.8 With regard to Woodcroft Farm, Grainger plc is committed to bringing the site forward early in the Plan period. Assuming a grant of consent in late Summer/ Autumn 2011 and taking into account the time needed for preliminary works, the delivery of Woodcroft Farm would take place as follows:

§	2012/13	20 dwellings
§	2013/14	100 dwellings
§	2014/15	100 dwellings
§	2015/16	100 dwellings
§	2016/17	20 dwellings

- 2.9 This Trajectory mirrors that submitted within the Pre-Submission Representations to the Local Authority, and is considered deliverable.

11. Is the target for 60% of housing on previously developed land (PDL) appropriate; can it be met?

- 3.1 Savills has no specific comment to make on this question.

12. Is the discount rate realistic?

- 4.1 Savills has no specific comment to make on this question.

13. Is there sufficient flexibility in the proposals to deal with contingencies?

- 5.1 Beyond the quantum of completions to be delivered from the Strategic Sites identified within the Core Strategy, it is Savills' understanding that a number of additional smaller sites will be identified

through the production of a Development Delivery Allocations DPD. Within such a strategy, the Council has reduced the risk of non-delivery, by not relying on any single site to bring forward the majority of the housing requirement Plan period. The identification of smaller sites through a subsequent DPD, coupled with the identification of two Strategic Sites within the CS to compensate for lead in times in considered a sound approach.

14. Are the proposed percentages and thresholds in Policy CS9 based on sound evidence and consistent with PPS3?

- 5.2 At the Preferred Options stage of the Core Strategy Review (Reg. 25), Savills made detailed comments concerning the inflexible Policy put forward by the Council. Using the term 'minimum' and in the absence of any reference to viability, the Policy was not considered Sound or reactive to changing circumstances.
- 5.3 Substantial changes were made to the Policy as contained within the Pre-Submission Draft of the CS, which allow for more flexibility during the Plan period. The recent down turn in the housing market has demonstrated the volatility that can occur in respect of land values, and thus the ability to deliver a prescribed proportion of Affordable Housing and other Planning Obligations.
- 5.4 The DTZ Report published in 2008, was clear in it's advice to the Local Authority, in that within the Borough land values varied to the point where in some areas 40% affordable housing could be delivered, but on others, a level of 20% could be considered appropriate. The variation in land values within the Borough is also reflected within the updated DTZ Report on Viability (2010). Beyond existing land values, the ability to generate grant funding is also a major consideration in respect of deliverability.
- 5.5 Savills has not objected to Criterion 2 of Policy CS9 within the Core Strategy, on the basis that with a range of 30-40%, supplemented by a viability clause, it is considered that there is sufficient flexibility within the Policy to react to changing circumstances.
- 5.6 An objection has been raised however in respect of the wording of Para 6.16 of the submitted CS, which states that following further viability work, '*where appropriate, a higher level of affordable housing will be sought*'. If the Authority wish to cite the potential to vary the percentage of affordable housing during the Plan period, then it should be acknowledged within the text that a higher **or lower** level will be sought. This objection is set out within Savills' Pre-Submission Representation concerning Para 6.16.



5.7 The notion that land values will only ever increase is a flawed approach, and the CS needs to be worded to take into account any fluctuations in land value in the future, whether that be up or down.

15. Is the expected level of Affordable Housing deliverable; what effect would the requirements have on the viability of housing schemes?

6.1 While an important factor, the viability of housing development is not entirely set by the level of Affordable Housing to be sought. Cumulatively, other elements of Planning Gain can tip the balance in terms of the deliverability of a scheme, and thus the approach to identifying a suitable level of affordable housing should be taken on a site by site basis.

6.2 With the viability clause included within the Policy and sub-text (which carries the same weight), Savills consider the Policy sufficiently flexible to allow for variations across the Borough and during the life of the Plan period.

16. Is the CS flexible enough to allow for the current housing market conditions?

7.1 While Savills has a number of objections pending for consideration by the Inspector concerning the specific wording of some Policies and sub-text, through the changes made by the Authority in advance of Submission of the Core Strategy, on balance the DPD is considered sufficiently flexible to deal with current market conditions. To reflect changes to National Policy, the Council should (and we believe is) make changes concerning the removal of a minimum Density target to reflect the changes to PPS3.

7.2 While Para 6.10 sets out a desire to implement a Phased Approach to delivery of greenfield sites to be identified within the Development Delivery Allocations DPD, under no circumstances would Grainger plc support such a phasing element to be applied to the Strategic Sites.

7.3 The lead in times for any development site, but particularly larger urban extensions is such that the Authority cannot simply turn on or off the supply as it sees fit. Landowners, Developers and Banks require certainty in the current economic climate.

END OF STATEMENT