

# BJC

**HAVANT BOROUGH COUNCIL  
LOCAL DEVELOPMENT FRAMEWORK  
CORE STRATEGY EXAMINATION**

**Statements addressing Inspectors Questions  
for Hearing Session considering**

**HOUSING POLICY**

**Statement of  
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**On behalf of  
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## GENERAL HOUSING

### 1.0 INTRODUCTION

- 1.1 This Response is submitted on behalf of Barratt Homes Southampton. The company has acquired an interest in land at Havant Road, Emsworth (UE 2b) and Emsworth Road, Havant (UE 2a). This land lies north and south of the A27 close to its junction with the A259. The A27 stands on a 6 metre high embankment at this point. Barratt Homes are proposing housing development on UE2b while a proposal for a significant recreational use is being investigated for the area defined as UE 2a.

#### Question 9

**Will the right amount of housing be provided in appropriate sustainable locations?**

- 2.1 Chapter 6 sets out the Council's objectives and delivery strategy for the provision of Housing. The objectives are vague.
- 2.2 One of the objectives states that "new homes will be distributed across the five main areas of the Borough taking into account sustainability, suitability and land availability." The only guidance on the distribution has to be deduced from the strategic allocations at West of Waterlooville MDA (600 units) and Woodcroft Farm (340 units) which could provide 940 dwellings of the proposed 6300 for the Borough. A further 2400 dwellings are proposed in the area of Winchester District. Thus, there are 3340 dwellings proposed on the western extremity of the Borough.
- 2.3 The SHLAA also has a western bias. Maps 1 and 2 show the relatively high number of 'urban area sites' in the west which emphasises the bias. On the eastern side of the Borough, Map 6, Emsworth, shows that there are very few SHLAA sites with very modest number of units.
- 2.4 With regard to Spatial Distribution Paragraph 8.05 states that "the Core Strategy sets out the overall distribution of development." This is refuted as the only guidance in the CS is found in Policy CS15 Point 3 which states that "development will be permitted that ..... **broadly distributes** the new housing and employment development in the five urban areas of the Borough". This cannot be described as spatial policy guidance. The objective should be to distribute the development to achieve choice and balance. It is

also important to maximise the provision of affordable housing where it assist the objective of social cohesion.

- 2.5 PPS3 states that 'LDD's should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development.' '... taking into account ...The need to develop mixed, sustainable communities *across the wider local authority area* as a well as at neighbourhood level' (para. 38).

### **Making the Core Strategy Sound**

- 2.6 'Broadly' is neither a relevant spatial objective nor is it based upon sustainability. Thus, other criteria should take precedence.
- 2.7 The CS states in paragraph 8.05 that "the detailed allocation of all types of sites will follow in the Development Delivery (Allocations) Plan." The Inspector stated in respect of the Test Valley CS that it should make "clear spatial choices about where development should go, as per 5.2(4) of PPS12" and not to place so much reliance on the future publication of the Development Delivery (Allocations) Plan.
- 2.8 In conclusion, the Core Strategy is unsound because it proposes development "broadly" in line with the existing distribution over the Borough. PPS3 Paragraph 33 states that the objective is "the most sustainable pattern of housing". It is evident that the present distribution is already skewed towards the western edge of the Borough. This lack of balance is further exacerbated by the proposal to create a Strategic Site at Woodcroft Farm.
- 2.9 Thus, the Core Strategy should increase the number and magnitude of proposals on the eastern side of the Borough which already possess good facilities and excellent communications.

### **Question 10**

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

- 2.10 The evidence of the SHLAA is a significant level of reliance on sites in the Urban Area. There is little prospect that this will prove to be a successful trajectory. Indeed, proposals for housing developments at Scratchface Lane (UE7) and Hampshire Farm (UE10) are either well advanced or in the latter

case, submitted as planning applications. Of these two sites only Hampshire Farm is on the eastern side of the Borough.

- 2.11 The Council's support for the Land West of Emsworth (UE11) is surprising. It is proposed to commence in 2014/2015. This site lies within the Area of Outstanding Natural Beauty (AONB). This runs counter to the statement in Paragraph 4.28 (SHLAA) that "Sites within an AONB were not discounted on the basis that development in this area may be permitted where there is an overriding national interest or a lack of sites elsewhere." This does not seem to be followed by the decision to release the site at a relatively early stage in the plan period. There is a serious weakness in the analysis. Other sites should be advanced which have less impact upon the landscape and national guidance.

### **Making the Core Strategy Sound**

- 2.12 The proposal to release more Urban Extension Sites on the eastern side of the Borough is supported but it should be given greater emphasis. This will provide a better balance both for private and affordable housing and therefore be more sustainable.
- 2.13 Urban Extension Sites should be released at the earliest stage in the plan period in recognition of the lack of viability and poor provision of affordable housing that Urban Sites can offer.
- 2.14 The release of more sites on the eastern side of the Borough is imperative to provide balance of housing provision.
- 2.15 The Council should respect its own guidance and release sites in the AONB only when and if other alternatives are exhausted.

### **Question 11**

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

- 2.16 The Core Strategy states that 35% of new development took place on garden land. The Annual Monitoring Report also states that 85% of housing took the form of flats. The number of units developed on garden land and in the form of flats will reduce significantly in the future for different but interrelated reasons.

- 2.17 The revised PPS3 has changed the presumption with regard to the definition of garden land which now enables local planning authorities to resist proposals involving garden land. This change in the presumption together with removal of minimum densities will reduce the number of housing units achieved within the defined existing urban area.
- 2.18 The second consideration is the fact that the housing market has been saturated with flats and house builders are now much more cautious when considering this form of development. Flats will only be built in future on more selective locations such as areas where demand continues to exist and those where views add an additional sales benefit.
- 2.19 These two factors combine to have a further influence on housing production within the urban area because it will make many sites unviable. PPS3 paragraph 29 requires "an assessment of the likely economic viability of land for housing". Changes of use from commercial use to residential use will also be restricted because of the economic objectives of the sub-region to promote employment.
- 2.20 It must be very questionable if the objective of 60% of new housing development can be achieved on previously developed land. The corollary is that much more development will have to take place on 'greenfield' land than was previously envisaged. PPS3 states that 'there is no presumption that land that is previously developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed' (para. 41).
- 2.21 The Core Strategy favours a 'phasing policy' but it is not clear how this will be formulated as the CS acknowledges that "some sites on PDL (Previously Developed Land) in the urban area are not currently available or deliverable for housing development". The CS suggests that the sites will be prioritised but there is no criterion in the CS to guide developers.

### **Making the Core Strategy Sound**

- 2.22 The CS admits that it will be difficult to achieve 60% on Previously Developed Land. It states that during the plan period it only expects to achieve between 51-42% on Previously Developed Land (Para. 6.12). The CS appears to rely on other Districts in PUSH to make up the shortfall.
- 2.23 I believe that the Council needs to bring forward the Urban Extension Sites at an early stage because of the issues surrounding urban sites and recognise

that the urban sites are likely to be delayed until the latter part of the Plan Period because of issues of viability. The benefits of the early release of Urban Extension Sites also relate to the provision of affordable housing and the need to re-balance the development in favour of the eastern side of the Borough.

2.24 Paragraph 6.09/11 recognises that “in times of economic downturn expected delivery is likely to reduce.” This is an important consideration but the paragraph then states that “this is likely to be a national issue and it should not be an excuse to bring forward inappropriate sites or urban extension sites in preference of developing previously developed land.”

2.25 This is an inappropriate admonishment as it is the responsibility of the authority to ensure that there is “an up to date five year supply of deliverable sites” (para. 70, PPS3). The statement above should be deleted from the Core Strategy.

#### **Question 12**

**Is the discount rate realistic?**

2.26 I have no comment upon this Question.

#### **Question 13**

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

2.27 The Core Strategy provides little guidance on how it will manage contingencies where sites fail to come forward or produce the required number of units. PPS3 states that ‘The government’s objective is to ensure that the planning system *delivers a flexible, responsive supply of land.*’ (para. 52).

2.28 There is no criteria to guide developers.

#### **Question 14**

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

2.29 The Core Strategy proposals with regard to percentages and thresholds are surprising. The CS seeks a relatively wide range between 30-40% and it is notable that it has not met the lower end of this range in the past three years. In order to make good the fact that the DTZ advice that only 30% is

realistic, the CS may seek a higher percentage target and this is based upon the recognition that “the policy allows for flexibility which is likely to be necessary in a poor housing market” (para. 6.16 CS).

- 2.30 The CS recognises the weakness of the market situation but it does not say how or where it will increase the percentage. There is only one area where affordable housing can meet the needs of the community and this is on the Urban Extension Sites.
- 2.31 With regard to thresholds, it seems unlikely that lowering the threshold will increase the provision of affordable housing. On the contrary, it will simply make more sites within the urban area unviable.

### **Making the Core Strategy Sound**

- 2.32 The CS needs to provide clear guidance on the impact of the recession which means a much more flexible approach to development.
- 2.33 I do not understand paragraph 6.17 which appears to be concerned about maximum levels of affordable housing and proposals for ‘large developments of entirely affordable housing’. Is this a likely proposition? It also recognises the problems that this could bring in terms of community cohesion. This once again points to the need to develop sites away from Leigh Park and Wecock Farm and in areas in the eastern part of the Borough where there is a much lower proportion of affordable housing.
- 2.34 The proposal for 340 dwellings at Woodcroft Farm should be held back, if not dropped, until the development at the West of Waterlooville MDA/SDA is well advanced. It is difficult to see how an area of land on its outer edge will be able to create any improvement to its problems of social cohesion.

### **Question 15**

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

- 2.35 The Core Strategy acknowledges that owner occupation will remain out of reach for many people in the Borough (para. 1.26). It is also recognised that Havant has one of the highest levels of multi-deprivation in the UK.

- 2.36 The magnitude of the requirement for affordable housing is well known. The quote from a recent meeting of the West of Waterlooville Forum sets out the desperate nature of this issue.

**In 2006 a Housing Market Assessment was commissioned to assess the need for affordable housing in the area. This indicated a backlog of need of around 850 households. The study took no account of newly arising need so given the limited development in the area since it is probable that unmet need has increased, and that it will increase further over the lifetime of the development. It is also worth noting that there are over 10,000 households on the Hampshire Home Choice register, and that as a consequence there were 79 bids for each 1 bedroom affordable unit on the Taylor Wimpey scheme, and 149 bids for each 3 bedroom property. The market popularity of the Taylor Wimpey scheme also demonstrates that it is meeting a need for high quality new market housing in the area.**

**Paragraph 1.6; West of Waterlooville Forum: Progress Report dated 7 July 2010**

- 2.37 The area covered by Hampshire Home Choice includes the Districts of East Hampshire, Havant and Winchester. It is also known that the Council has been unable to meet its own target as set out in its document entitled "Forward Together: A Sustainable Community Strategy for Havant Borough".

	2005/06	2006/07	2007/08	Target
Private	289	213	310	164
Affordable	109	90	137	100
Total	398	303	447	264
<b>Affordable %</b>	<b>27%</b>	<b>29%</b>	<b>31%</b>	<b>38%</b>

- 2.38 Having set a target of 38% of housing to be affordable, it has not achieved this percentage in the past 3 years. On the other hand, the proportion of private housing has comfortably exceeded the overall target. This indicates an ever growing crisis for those in need of affordable housing even though the overall target is exceeded.

- 2.39 The reduction in development within the existing urban area will reduce the number of affordable housing units provided from this source. It is also known that many of these sites were beneath the threshold for provision. This is the case if the threshold of 15 units set out in PPS3 is applied or even lower as favoured in the CS. The recession will make many more of the sites within the existing urban area unviable and the requirement for affordable housing will possibly be the decisive influence on the developer to abandon small schemes.
- 2.40 An analysis of the SHLAA sites within the existing urban area reveals the modest size of many sites and these will either provide few affordable units if any or make the sites unviable.

### **Making the Core Strategy Sound**

- 2.41 It should be recognised that the adequate provision of affordable housing will rely substantially upon large urban extension sites which both exceed the threshold and can accommodate the provision of affordable housing without undermining the viability of the proposals.
- 2.42 It is evident that the prospect of providing affordable housing on small sites in the urban area will make them unviable. The achievement for the 30-40% target will inevitably rely upon the more viable sites found on 'greenfield' or Urban Extension sites.
- 2.43 The concentration of substantial affordable housing levels in areas that are already dominated by existing high proportions of affordable housing is unlikely to reduce the deprivation experienced in these areas such as Leigh Park and Wecock Park or improve social cohesion. There is obviously an internal conflict between the objective of Policy CS8: Housing (Point 3) to "ensure mixed communities are created so as to avoid an over-concentration of affordable housing in large developments" and the creation of more affordable housing in this location.
- 2.44 The proposed distribution of affordable housing is skewed to the western and northern parts of the Borough. The lack of viability of redevelopment sites will reduce the level of provision of affordable housing from brownfield sites. There is a clear need for more development in the eastern part of the Borough.

**Question 16**

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

- 2.45 It is evident that the recession will make many sites within the urban area unviable. Some sites will not proceed in the foreseeable future until plot values return to pre-recession levels. There is clear need to release Urban Extension Sites at an early stage.
- 2.46 The Urban Extension sites can also meet the affordable housing targets too. Finally, it is important to recognise that housing developments provide employment for local residents
- 2.47 It appears, therefore, that the level of provision identified in the SHLAA will prove to be overly optimistic. The Council recognises that there will be a significant reliance on greenfield sites and the SHLAA also identifies numerous Urban Extension sites. Of these sites, the Council has already identified the ones that it favours for release. This is the objective of the Development Delivery (Allocations) Plan and not the purpose of the SHLAA. This is a matter of putting 'the cart before the horse.'

**Making the Core Strategy Sound**

- 2.48 Thus, the Council has assumed that the Core Strategy is not only sound but provides an adequate basis for the assessment of sites. The prime objective must be the adequate provision of housing.