

HAVANT BOROUGH COUNCIL - CORE STRATEGY PRE- SUBMISSION (MARCH 2010)

FURTHER WRITTEN COMMENTS ON HOUSING
ISSUES 9 AND 13-16 FOR:

MR CHRISTIAN AND MR SHIPP

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1.0 INTRODUCTION

1.1 These further written comments have been prepared on behalf of Mr. Shipp and Mr. Christian. They follow written objections to the Pre submission Core Strategy dated May 2010 which dealt with the delivery and distribution of housing, the potential for increasing the supply of affordable housing and the future role of countryside designations. These further comments specifically deal with the issues identified for the Housing policy sessions on the 14th September, namely issues 9, 13, 14, 15 and 16. The objector is relying on the written comments together and will not be attending the Examination.

2.0 HOUSING ISSUES

2.1 Since we prepared our last comments in May 2010, Regional guidance has been revoked. We welcome the clarification of Havant Borough that it remains committed to the regional house building target of 6,300 dwellings for the Borough, but we remain unclear about the means of delivering affordable housing and the level of affordable housing which will be required on development sites (see housing issues 14-16).

2.2 PPS12 - Local Spatial Planning (paragraph 4.52) explains that for a Core Strategy to be sound, it has to be shown to be justified, effective and consistent with national policy. To be effective means that it must be deliverable, flexible and able to be monitored and we have doubts that Policy CS9 which deals with affordable housing meets those tests.

2.3 For instance, CS9 sets an overall target of 30-40% provision, but this has simply been taken from the now revoked South East Plan policy SH6. This

range is too wide anyway to allow proper consideration of site viability and we would suggest a more defined target is included in policy at the outset.

- 2.4 The Havant Viability Assessment produced for the Core Strategy (paragraph 6.16 of Pre Submission Core Strategy) suggests a 30% contribution and existing Local plan policy H8 also sets out a 30% contribution on qualifying sites of 0.5 ha/15 dwellings. We would suggest retaining this in new policy CS9, particularly as viability is an ongoing concern for the development industry in the current recessionary market. This target could be reviewed at the Delivery Allocations DPD stage in light of the further viability work which the Council says is expected to be undertaken in the future (see paragraph 6.16 Pre Submission Plan).
- 2.5 We continue to question why the Core Strategy doesn't contain a rural exceptions policy for affordable housing outside settlement policy boundaries as the Borough is not without its defined open countryside. Such a policy would allow the spread of affordable housing across the Borough to respond to areas of local need and make the plan more flexible.
- 2.6 As already pointed out in our earlier written submission, Key priority 5 of the Council's Sustainable Community Strategy (SCS) requires the provision of affordable homes across a range of locations to meet housing need and point 3 of policy CS9 sets out to ensure mixed communities are created through the planned distribution and avoidance of a concentration of affordable housing. However, without an exception policy, the distribution of affordable housing will only be delivered in association with open market housing. Much of this is proposed in large strategic sites and this would concentrate affordable housing contrary to point 3 of CS9. The large strategic sites can also be expected to have a long lead in time and as a result, the provision of affordable housing may be prejudiced in the early part of the plan period. An exception policy

would address both these policy shortcomings. To avoid any allegations of exception sites leading to localised concentrations of social housing, their capacity could be capped at 50 dwellings as a reasonable compromise.

- 2.7 We agree that the overall development strategy of the Core Strategy (housing issue 9) should be to provide for a spread of development across the Borough. However, policy CS9(4) needs to be more explicit on the potential locations for smaller housing sites and should refer to sites requiring a close association with recreational areas as well as public transport hubs, employment shops and services. This change would dovetail the policy with key priority 1 of the SCS and the objectives of the Council's Open Spaces Plan both of which seek to retain important recreation areas and to improve local access to them to increase their usage. Both documents are important parts of the evidence base for the Core Strategy and fuller reference to them would illustrate the justification for the spread of development strategy.
- 2.8 Housing issue 13 questions whether the Core Strategy is sufficiently flexible in general to deal with contingencies. One contingency we would refer to is the Government's new Community Right to Build policy. If taken at face value, this new initiative can be expected to deliver additional housing where the community supports it. We therefore would welcome guidance in the Core Strategy to clarify whether housing allowed under this policy would be additional to the overall housing requirement or not; in which case the status of the unidentified community sites and all other allocated previously developed and Greenfield sites would need to be clarified in the interests of the plans overall 'effectiveness' in housing delivery and its implementation.