

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

FURTHER WRITTEN COMMENTS ON HOUSING AND DEVELOPMENT MANAGEMENT ISSUES FOR:

HILLREED HOMES LTD

August 2010

1.0 INTRODUCTION

1.1 These further written comments have been prepared on behalf of Hillreed Homes Ltd. The comments elaborate on the written objections to the Pre submission Core Strategy dated May 2010 and specifically deal with the further issues identified for the Housing and Development Management policy sessions on the 14th and 16th September. The objector is relying on these comments and will not be attending the Examination.

2.0 PRE SUBMISSION WRITTEN OBJECTIONS

2.1 Our written comments to the Pre Submission Plan dated May 2010 set out our concerns on the Housing policy CS9, design policy CS14 and Development Management policy DM7. The concerns were that some of the emerging Core Strategy policies would be in conflict with saved Local Plan policy and since these would remain in force until replaced by the Development Delivery (Allocations) DPD in June 2012 there would be the potential for conflicting policies to exist side by side. We remain of the view that the saved Local plan policies are intended to remain in force alongside the new Core Strategy policy because paragraph 1.44 and 1.17 of the Pre Submission Plan refer to saved policy and development management policies providing complimentary detail and no change has been made to them in the Schedule of Changes.

3.0 HOUSING AND DEVELOPMENT MANAGEMENT ISSUES

3.1 The Hearings programme lists housing policy matters for discussion under issues 9-16 and issue 25 concerns the Development Management Policies.

These comments on housing are in respect of housing issues 11, 13, 14, 15 and 16.

- 3.2 Since we prepared our last comments in May 2010, Regional Guidance has been revoked and the government has also signalled its intention to introduce the 'Community Right to Build' procedure as part of a new Localism Bill. PPS3 has also been revised to delete reference to the 30 dph minimum housing density guideline and has redefined 'previously developed land' to exclude residential gardens.
- 3.3 We welcome the clarification of Havant Borough that it remains committed to the regional house building target of 6,300 dwellings in the now revoked South East Plan. However, with the other legislative changes referred to above, we continue to have doubts that the Core Strategy can actually deliver the housing in an effective way.
- 3.4 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 the Core Strategy meets these tests for the following reasons.
- 3.5 The relevant policy is CS9 and whilst it acknowledges the target of 6,300 dwellings, it does not explain how much is expected to come forward on previously developed land and at what density. All the policy states (part 8) is that the policy will ensure housing development is delivered in a phased manner with appropriate provision of previously developed land so as to avoid unnecessary development on Greenfield urban extension sites.

- 3.6 We are unclear whether the Council has included residential garden land in its previously developed land target. Paragraph 6.20 of the Pre Submission plan also acknowledges that the densities of development range from a minimum of 60 dph to a minimum of 30 dph and yet much lower density might now be justified after the revisions to PPS3. In this case, the overall capacity of sites will have been overestimated and more Greenfield land will be needed to offset the shortfall.
- 3.7 We are also unclear about the Council's justification for affordable housing thresholds and its provision in the new Core Strategy policy CS9. It 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.
- 3.8 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, with no requirement whatsoever for developments below this, 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).
- 3.9 There is also the Community Right to Build policy which if taken at face value, will deliver additional housing where the community supports it. We therefore 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 need to be clarified in the interests of the plans overall 'effectiveness' in housing delivery and its implementation.

- 3.10 Issue 25 deals with Development Management Policy. It asks 'are the development management policies appropriate and are they consistent with government guidance?
- 3.11 The development management policies of the Core Strategy relate to the effectiveness test. As indicated earlier, the status of these and other saved local plan policies needs to be clarified to avoid a situation arising where conflicting policies are left in place before the Development and Delivery Allocations DPD is adopted.
- 3.12 As a presentational point, the development management policies and other Core Strategy policy have been separated out unnecessarily. For instance DM7 deals with elderly and specialist housing provision and CS14 concerns high quality housing design. Both policies would be suitable for inclusion in the development management part of the plan and we would suggest reordering the policies accordingly.