

Housing Delivery Action Plan

January 2025



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1. Introduction

- 1.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery for plan-making authorities.
- 1.2 The National Planning Policy Framework (NPPF) states where the HDT indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance. This action plan follows the publication of the 2023 Housing Delivery Test measurement¹ in December 2024 which indicates a result of 74% for Havant Borough.
- 1.3 Where delivery falls below 75% of the requirement over the previous three years, the NPPF indicates that the presumption in favour of sustainable development applies. The NPPF is also clear that the 'presumption' does not change the statutory status of the development plan as the starting point for decision making. In Havant Borough, this comprises of:
 - The Havant Borough Local Plan (Core Strategy) adopted March 2011
 - The Havant Borough Local Plan (Allocations Plan) adopted July 2014
 - The Hampshire Minerals and Waste Plan adopted October 2013
 - The Emsworth Neighbourhood Plan 'made' September 2021
- 1.4 This action plan sets out why the authority has not delivered against its housing requirements and identifies a number of actions to increase housing delivery. However, it should be recognised that housing delivery is a complex matter, which includes the involvement of landowners, developers and registered providers. Consequently, the cooperation of all partners is essential to significantly boosting housing supply and the delivery of this action plan.

¹ <u>https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement</u>

2. Housing Delivery Analysis

Past Performance Housing Delivery

- 2.1 The housing requirement for Havant Borough is currently set out by Policy CS9 of the Core Strategy (2011) sets out a requirement for a net total of 6,300 dwellings to be delivered between 2006 and 2026, which equates to an average annual delivery rate of 315 dwellings per annum.
- 2.2 Table 1 indicates the levels of housing delivery since the start of the plan period for the Core Strategy. To date, 5,567 dwellings have been completed (from 2006 – 2023) which equates to an average annual delivery rate of 327 dwellings (~4% more than the average annual housing requirement).

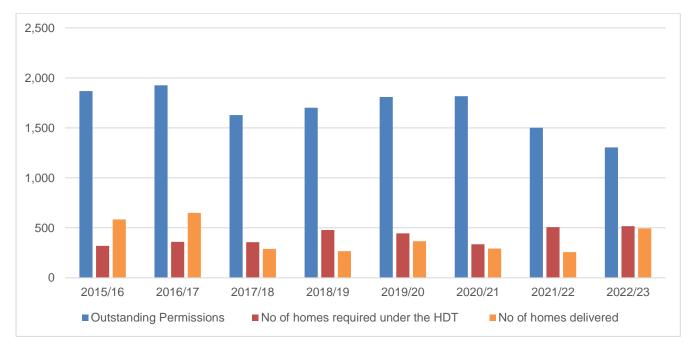
Table 1 – Housing Completions 2006 - 2007 and 2022 - 2023

Monitoring Year	Net Additional Dwellings
2006 – 2007	236
2007 – 2008	390
2008 – 2009	252
2009 – 2010	145
2010 – 2011	231
2011 – 2012	168
2012 – 2013	249
2013 – 2014	200
2014 – 2015	492
2015 – 2016	584
2016 – 2017	649
2017 – 2018	290
2018 – 2019	267
2019 – 2020	366
2020 – 2021	294
2021 – 2022	259
2022 – 2023	495
2023 - 2024	368
TOTAL	5,935

- 2.3 There has been significant variability in the number of net additional completions completed each year. Assuming a requirement of 5,670 dwellings over 2006 2023 (18 years x 315 dpa), total completions of 5,935 dwellings mean that an additional 265 dwellings have been delivered between 2006/07 and 2023/24.
- 2.4 The lowest rate of delivery at 145 dwellings during 2009-2010 preceded the adoption of the 2011 Core Strategy, whilst 2016-2017 saw the highest rate of completions (649 dwellings) with the delivery of a number of larger sites including the West of Waterlooville major development area. It is notable a rise in completions follows the adoption of the Allocations Plan in 2014.

- 2.5 In late 2018, the Dutch Case² resulted in the Council being unable to permit most housing developments for nearly 18 months. This led to a suppression in housing delivery rates in the monitoring year(s) that followed. In August 2020, the Council launched its own nutrient neutrality mitigation scheme which is now being supported by a range of other mitigation schemes across South Hampshire³.
- 2.6 The impact of nutrient neutrality in Havant borough combined with macro-economic uncertainty have further compounded housing delivery in Havant Borough in recent years.
- 2.7 The following bar chart summarises the number of outstanding planning permissions as of 1 April relative to the 'number of homes required' under the Housing Delivery Test and completions that monitoring year (1 April 31 March). It shows that in all three measurement years (2020/21-2022-23), the Council has granted sufficient planning permissions far in excess of the 'number of homes required' under the Housing Delivery Test (HDT), but 'number of homes delivered' fell short in all three years. Of the 1,304 dwellings with outstanding planning permission on 1 April 2022, 495 dwellings were completed during 2022/23.

Figure 1: Outstanding planning permissions relative to the number of homes required under the Housing Delivery Test results and the number of completions that monitoring year



Sites contributing to current supply

- 2.8 As set out above, the adopted Core Strategy sets out a housing requirement of 315 dwellings per annum which pre-dated the publication of the National Planning Policy Framework (NPPF).
- 2.9 The requirement for local planning authorities to prepare a Local Plan that meets the full, objectively assessed need for housing in its area means that the Council's new Local Plan which will be

 ² Cooperatie Mobilisation for the Environment UA and College van gedeputeerde staten van Noord-Brabant (Case C-293/17 and C294/17) available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CA0293
³ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CA0293

known as the Building a Better Future Plan - will need to address a much higher level of housing delivery than has been previously planned for. Given that the Borough is likely to be an authority which cannot meet its housing need in full, the Council will also need to demonstrate that 'no stone has been left unturned' in identifying housing sites which are suitable for development.

- 2.10 In 2016 when the Council commenced work on the previous Local Plan, the Council took early action to boost housing supply in the Borough through the adoption of the Local Plan Housing Statement. This document identified a number of sites which the Council considered appropriate for 'early release' in advance of the adoption of the Local Plan. This included a number of sites outside of the urban area boundaries and within undeveloped gaps between settlements which have contributed to housing supply in recent years.
- 2.11 The previous Local Plan indicated how Havant Borough could just about meet overall housing need (based on the standard method) at the point of submission in 2021. This relied on a significant source of housing supply being delivered from town centre regeneration, but the Inspectors' report identified concerns about the deliverability of housing supply (paragraph 51)⁴ prior to the Plan's withdrawal from Examination in 2022. The previous Local Plan Inspectors' also highlighted that Havant Borough may be an authority that cannot sustainably meet its housing needs (paragraph 52).
- 2.12 Whilst the new Draft Local Plan has been in production, the Council has used a similar approach taken in 2016, with the adoption of a position statement. This sets out how planning applications for housing not in accordance with the development plan will be considered. This has resulted in a number of further sites being granted proactively in order to maintain housing supply in Havant Borough:
 - Camp Field, land to west of Havant Crematorium, Bartons Road APP/21/00678 | Reserved Matters Pursuant to Outline Application for 70 dwellings. Granted June 2023.
 - Southleigh Park House APP/21/01451 | Reserved Matters application for the scale and appearance of the development, the landscaping of the site and the layout of buildings pursuant to Planning Permission ref. APP/17/00863 (B) (Outline Application (All Matters Reserved except means of access) for the demolition of 1983 office building and associated brick and glass corridor link and development of up to 70 residential units, associated landscaping, parking and infrastructure works). Resolution to Approve January 2024.
- 2.13 In addition to the above, the Council is currently working with applicants to bring forward development on a number of unallocated sites:
 - Land East Of, College Road, Purbrook, Waterlooville APP/23/00488 | Application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access road, footways and cycleways, pumping station and drainage basins. Submitted June 2023.

⁴ https://www.havant.gov.uk/media/8718/download?inline

Housing delivery

- 2.14 The Council's new Local Plan will need to address the concerned raised by the Inspectors' Interim Findings report in the context of the NPPF.
- 2.15 The Council's new Strategic Housing and Economic Land Assessment (SHELAA) provides a comprehensive review of all sites and broad locations and an up-to-date and robust audit of all available land. An objective assessment of the developability of all sites was also undertaken including site phasing and where off-site environmental mitigation may be required. In addition, the Council has recognised a need to ensure that sites make the most effective use of land, and has regard to potential policy changes in the context of the likely shortage of housing land.
- 2.16 In order to support the Building a Better Future Plan, a 'call for sites' was widely publicised alongside the Regulation 18 consultation on the Local Plan in 2022. Landowners and site promoters, developers and agents with an interest in the borough were contacted to submit or promote sites using a Call for Sites form available on the Council's website. In March 2024, the Council re-published the 'call for sites' and accompanying forms on its webpage⁵. However, the limited land availability in Havant Borough means in practice a 'call for sites' never closes. Interested parties are therefore encouraged to submit potential sites for consideration at any time.
- 2.17 Havant Borough's objectively assessed housing need of 17,840 dwellings is substantially higher than any level of housing previously planned for. Furthermore, given the environmental constraints and limited land availability in Havant Borough, the new Draft Local Plan will need to establish a housing requirement which is capacity based and considers the amount of housing that can sustainably be delivered. However, in order to significantly boost housing supply this does not represent a ceiling but a realistic target based on development capacity.

Potential barriers to delivery

2.18 The physical and environmental constraints of the Borough strongly influence the capacity to accommodate new housing development. The Council's Constraints Study sets out:

"In summary – our work confirms that Havant Borough is exceptionally constrained. The Borough is not washed over by any one strategic constraint but is subject to multiple completing constraints. The land within Havant (Borough) is often within the Chichester Harbour Area of Outstanding Beauty (AONB / National Landscape) and its setting, and/or the setting of the South Downs National Park (SDNP). Both present strong landscape constraints and are afforded weight in national planning policy accordingly.

At the same time, in the south of Havant, additional constraints relate to the coast in terms of flood risk but also... ecology."

2.19 The Study also notes that previous rounds of plan making have filled in much of the undeveloped land in Havant Borough and have largely developed it to its administrative boundary. As such, aside from large land parcels such as Southleigh and Dunsbury Park, there is very little strategic scale land remaining which could be developed.

⁵ <u>Building a Better Future Plan (emerging Local Plan) | Havant Borough Council</u> – see 'Call for Sites – Submit a Potential Site'.

2.20 The remaining potential development sites in Havant Borough are affected by complex technical constraints. This means that planning applications on these sites can be in the planning system for some time before they can be determined, and subsequently built out. Where possible, the Council is working proactively to address these issues.

3. Key Actions & Responses

3.1 The Council recognises the need to significantly boost housing supply in Havant Borough. The following section sets out a number of key actions and responses to help support housing delivery:

Short term

Housing delivery is a key priority for the Council

- 3.2 Housing delivery, particularly affordable housing is a priority for Havant Borough Council, as detailed in the Council's Corporate Strategy Housing Strategy and Regeneration Strategy6.
- 3.3 In particular, the Council will develop relationships with developers, landlords and Registered Providers to gain greater control over housing delivery within regeneration areas and the Borough as a whole.

Progressing the Building a Better Future Plan

- 3.4 The Council is progressing the Building a Better Future Plan, which will provide greater certainty for those wishing to bring sites forward for housing delivery.
- 3.5 The Council will need to leave no stone unturned to meet as much housing need as sustainably possible. The Draft Building a Better Future Plan identifies all of the sites which are considered capable of delivering sustainable development.

Waterlooville Town Centre Masterplan

3.6 As part of the Council's regeneration area, the Council has developed a masterplan for Waterlooville Town Centre. Following formal public consultation, it is proposed that the Masterplan will be adopted as a Supplementary Planning Document and identifies key areas for growth, future development and improvements to the local economy, town centre precinct and the surrounding areas.

Redevelopment of the former Bulbeck Road Car Park

3.7 Following award of Brownfield Release funding, work to demolish the Council-owned car park at Bulbeck Road is almost complete. In November 2024, the Council has agreed the conditional sale of land to a preferred developer who will need to submit a planning application following exchange of contracts, and build the site out swiftly pending the grant of any planning permission. The Council will continue to explore external funding opportunities and the development potential of its own estate.

⁶ https://www.havant.gov.uk/our-organisation/strategy-policy-and-performance

Planning performance agreements

3.8 The Council has and continues to enter into planning performance agreements with a number of applicants where it provides dedicated resources for handling development proposals.

Medium term

Making the effective use of land

3.9 To ensure that developments make effective use of land, Policy 13 (Housing Density) in the Draft Building a Better Future Plan proposes the introduction of minimum density thresholds reflecting the accessibility of different areas, including town centres and other locations that are well-served by public transport.

Duty to cooperate with neighbouring authorities

- 3.10 In March 2023, Havant Borough formally requested assistance from neighbouring authorities Chichester District Council, East Hampshire District Council, Portsmouth City Council, the South Downs National Park Authority and Winchester City Council in meeting unmet housing need. In addition, Havant Borough also wrote to Fareham Borough Council and Gosport Borough Council given these authorities form part of the same housing market area within PfSH.
- 3.11 Winchester City Council's Proposed Submission Local Plan (Regulation 19) includes an 'unmet needs allowance' of about 1,900 dwellings to assist in meeting the unmet needs of neighbouring authorities, including Havant. The current unmet need allowance for Havant Borough (which has yet to be tested at Examination) is 1,330 dwellings.
- 3.12 A number of authorities notably Chichester District Council and Portsmouth City Council have progressed local plans that do not meet their needs in full. They are not therefore in a position to assist Havant Borough in addressing its unmet housing need. The Council will continue to engage with neighbouring authorities through the duty to cooperate which be documented through bi-lateral Statements of Common Ground as the Plan progresses towards Pre-Submission stag



4.1 The Council will continue to monitor housing completions and engage with developers and landowners promoting sites to ensure housing numbers and densities are delivered as per expectations in the housing trajectory.



