

Library Ref: MIQ20

Havant Borough Council Hearing Statement

Matter 2 – Housing

Prepared on behalf of

Portsmouth Water

Document control

Document:	Kingscroft Farm Hearing Statement- Matter 2	
Project:		
Client:	Portsmouth Water	
Job Number:	HP18061	
Revision:		
Date:	17 th June 2021	
Prepared by	Checked by	Approved By
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1. Introduction

1.1 On behalf of our client, Portsmouth Water, Tetra Tech Planning have been instructed to submit comments in relation to Matter 2 of the Havant Borough Council Local Plan examination. Matter 2 relates to Housing, including housing requirement, trajectory and supply. Our client owns the land known as 'Kingscroft Farm' which was previously allocated for residential development under the 2018 consultation version of the local plan. This statement has also been informed by a review of the Council's examination library and will respond to the Inspectors questions (MIQ01) and demonstrate why the spatial strategy for housing is not justified. It is considered that the submitted plan does not meet the legal requirements for plan making and therefore the strategy is not sound.

1.2 TP01 states that HBC will not be able to demonstrate a 5 year housing land supply on adoption of the plan, and that omission sites will be considered as part of the stage 2 hearings. Therefore, section 3 of this statement will summarise why the allocation at Kingscroft Farm to include the whole site is a realistic, achievable, deliverable and suitable outcome which will deliver additional, much needed new homes.

2. Housing requirement (Policy DR1)

'Is the housing requirement figure of 10,433 dwellings over the Plan period justified and is there any evidence to suggest that the housing requirement should be increased above the standard methodology figure in accordance with Paragraph 010 (Reference ID: 2a-010-20201216) of the PPG?'

2.1 The figure of 10,433 dwellings over the plan period is not justified. The standard method provides HBC with a starting point, as evidenced in paragraph 60 of the NPPF which states that this should be a 'minimum'. Paragraph 60 also states that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Considering the significant shortfall in the delivery of housing within both the Borough and neighbouring authorities, the standard method figure should be increased in accordance with paragraph 010 of the PPG as the housing need is higher than the standard method indicates.

2.2 HBC have applied a 3.2% (340 dwellings) buffer in relation to their housing requirement, however, it is considered that this buffer should be increased to at least the typical 5% margin, considering the historic failure of housing delivery. The Council also state in TP01 that this is unlikely to contribute to unmet need and that this number is 'relatively modest'. The Council state that this reflects the fact there is a need to plan for an additional years' worth of housing need, however this is not enough considering the unmet need of Portsmouth and Gosport. The PPG states that local authorities may need to plan for a higher level of need than the standard method. The Plan and accompanying evidence base do not provide a detailed assessment of which buffer would be appropriate to provide the unmet housing need.

3. Housing trajectory & supply

'The Council has set out that on adoption it is likely to have a 4.2 year housing land supply. Has all been done to try and boost the supply, of housing in the short term?'

3.1 HBC conclude that they will supply 10,773 new homes in the plan period against the requirement of 10,433. Despite this, HBC acknowledge that they will not be able to demonstrate a 5 year housing land supply over the next 5 years of the plan. A review of examination library document EB37 (Housing Delivery Action Plan) highlights that the Council aim to rely upon the quicker delivery of sites which will help in the 'short term' but this does not address the lack of supply. As previously stated, the Council should be re-assessing sites previously discounted in the SHLAA and any new supporting information that accompanies those sites which demonstrate they are now suitable. In its current state, it is considered that HBC have not done all they can do to boost housing supply.

3.2 The omission of an informed housing trajectory causes concern as to how sound the plan is, particularly given the fact that the Council will not be able to demonstrate a 5 year supply upon adoption. This emphasises the importance of strategizing forward supply even more. It is therefore even more important that the Council are able to demonstrate a robust trajectory in order to plan for sufficient housing and associated infrastructure. Additionally, the trajectory provided in appendix 1 of TP01 does not provide any evidence as to how its findings were arrived at or how the projected delivery dates are actually deliverable. It is considered that other sites need to be re-assessed to ensure the trajectory is realistic and to improve the housing supply in the Borough.

4. Consideration of omission sites- Kingscroft Farm

4.1 Kingscroft Farm was a draft allocation for residential development under the 2018 consultation version of the emerging local plan for circa 90 dwellings. The site was therefore considered a suitable and sustainable location for new development. The site was later discounted from the SHLAA due to concern with flood risk. The Council's SFRA (Local Plan Sites) of November 2018 dismissed this site but appeared to accept that once further work had been undertaken that the site could be suitable. However, the uncertainty around flood risk has led to the site being omitted from the current emerging local plan CD01.

4.2 However, an extensive amount of flooding work has since been undertaken which details flood modelling and defences which address the concerns raised. This was done following discussions with the Council and so they were fully aware that further work was being undertaken to address flooding queries.

4.3 The FRA was supported by consultations with the Lead Flood Authority (HCC), Southern Water and the Environment Agency. The conclusions of these exercises are that the allocation of the site would be suitable, subject to the implementation of the identified mitigation measures. The site was re-submitted to the Council for consideration, having undertaken the requested work on flooding, however the Council said it was too late and would not accept the information. This approach by the Council does not respond positively to the strategy topic paper (TP01) which stated that there is a need to 'leave no stone unturned' in identifying sites which are suitable for housing delivery (paragraph 16). A considerable amount of time has passed since then and the Council is still not allocating the site. It is considered that the previous allocation for residential development could be extended to cover the whole site to provide approximately 160 new homes in a highly sustainable location. Again, this was discussed with the Council and they seemed to think that was possible but discounted the site due to a timing issue that they had self-imposed.

4.4 It should also be noted that the constraints and supply analysis (EB39) illustrates the Council's approach appears relatively high level which has led to the exclusion of sites that through further analysis could be suitable. For example, the document places flood zones 2 and 3 in category 1 where it 'effectively removes some areas from further consideration',

however no consideration appears to be given to mitigation measures that can be put in place. It is not unusual for development sites to address these types of constraints; therefore it is not appropriate to rule out sites on this basis alone, especially when it is known that further work is underway to address the issue.

4.5 As paragraph 34 of MOH01 highlights, the Council will look at omission sites and we are taking this opportunity to re-submit the allocation for housing with the flooding information which demonstrates that there is now no reason why this site cannot be included.

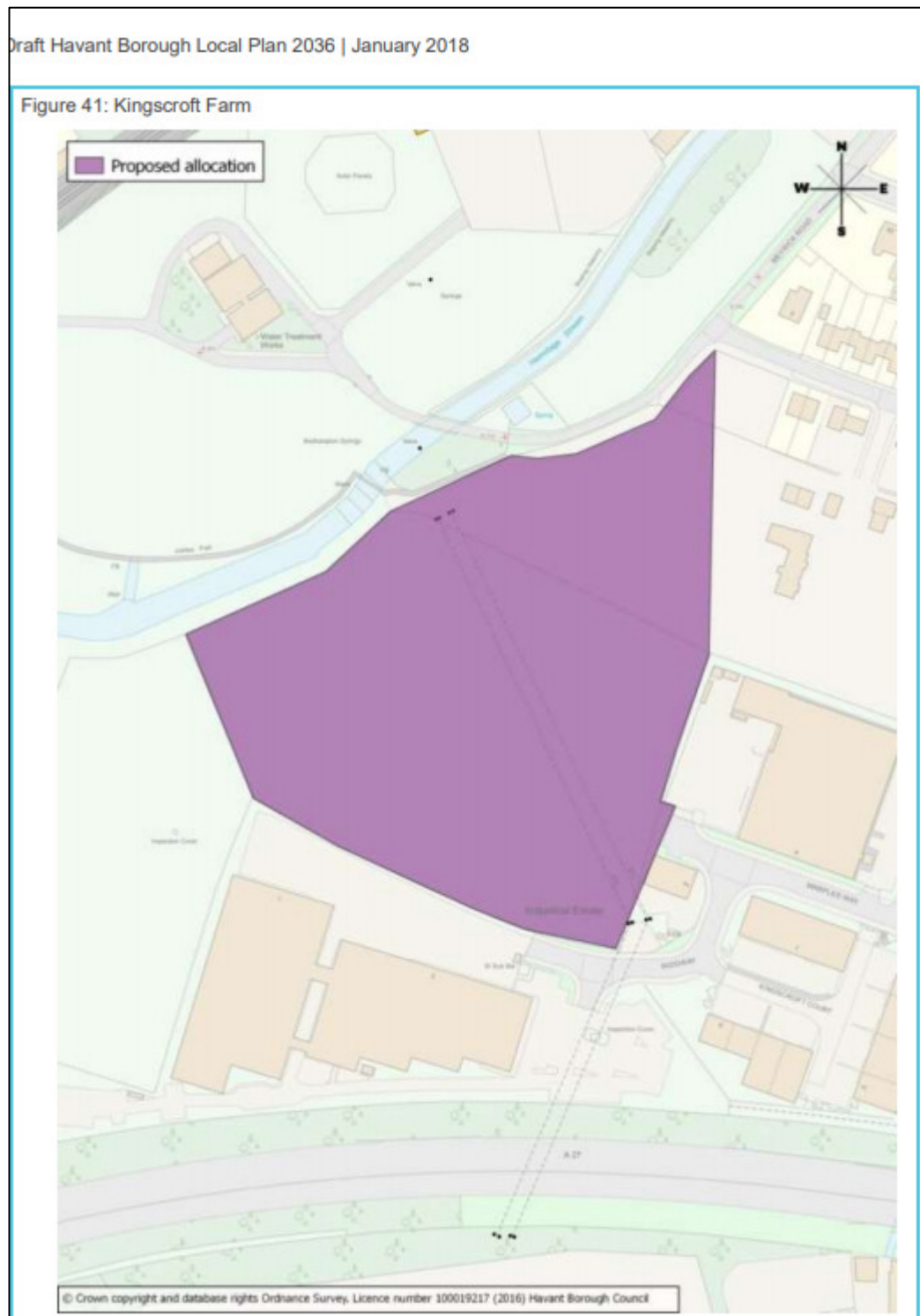
5. Summary

5.1 In summary, it has been demonstrated that the spatial strategy for housing is not justified. It is considered that the submitted plan does not meet the legal requirements for plan making and therefore the strategy is not sound. The NPPF states that plans should be positively prepared, providing a strategy which, as a minimum seeks to meet the areas OAN and that this is informed by agreements with other authorities, so that unmet need from neighbouring areas are accommodated. It is also considered that the strategy put forward has not taken into account reasonable alternatives. The housing trajectory is not effective as it does not deliver sufficient housing or demonstrate effective cross-boundary in relation to unmet housing need. To Conclude, all of the above show that the plan is not consistent with national policy, namely the NPPF and PPG.

Appendix 1

Location Plan

Previous allocation



Proposed extended allocation to cover whole site

