

Persimmon Homes South Coast response to Havant Borough Local Plan matters and issues for examination

MATTER 2: HOUSING

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Q2.1: Is the spatial strategy for housing justified?

1. Persimmon Homes South Coast (PHSC) does not object to the plan's strategy of directing development towards sustainable locations and recognises the desire for and benefits of town centre regeneration. However, there are two key issues with this strategy. The first is that redevelopments in town centres produce higher density, flatted schemes with no family homes and the risk is an imbalanced housing market. Indeed, paragraph 2.31 of the plan (as proposed to be amended) says how the plan '*encourages a renewed focus on high density housing in town centres*'. The second is the deliverability of the sites identified in the plan. As set out in PHSC's representation in respect of matter 1, concerns are raised in terms of the identified sites that make up elements of the Council's projected supply, namely:

Havant Town Centre

2. A wide area of Havant Town Centre is earmarked for regeneration with only limited areas are considered as being suitable for housing development: Civic Campus and Market Parade, which straddle the constrained, historic core of the town. The area was previously identified as having potential for only 225 dwellings in the site allocations document. A masterplan establishing the council's development parameters or layout is still to materialize, but nevertheless, the Council expects around 750 dwellings to be delivered in the town centre.

Waterlooville Town Centre

3. The council's approach has little emphasis on delivery. When assessed in the context of the fragmented ownership and the lengthy process of any CPO measures required to amalgamate the required land, there are clear doubts as to the deliverability of the Council's ambitious vision. Compounding this issue is the feasibility of accommodating 600 units at a town centre where market metrics do not readily indicate demand for small, flatted units in this location.

Q2.2 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?

4. One of the circumstances referenced in ref. ID: 2a-010-20201216 of the PPG where a higher housing figure is permissible is where an authority agrees to take on unmet need from neighbouring authorities.
5. As set out in PHSC's response to matter 1, there is a considerable unmet need for 10,750 homes in the PfSH area (as well as potentially from Chichester District Council) and the Havant Borough Local Plan is not set to deliver a single one of them. And yet there is deliverable land being promoted by PHSC at Southmere Field¹. PHSC therefore finds that the target for delivering 10,433 is not justified because the plan fails to make any contribution towards meeting unmet needs when it clearly could do.

¹ SHLAA 2020 ref. HB15

6. Paragraph 63 of the Sites Topic Paper (TP02) says that the Council has looked to identify suitable mitigation measures wherever possible in order to overcome constraints and any site considered suitable for development has been allocated. However, PHSC's site at Southmere Field has been ruled out on highly illogical grounds that were readily rebutted at the Regulation 19 stage², namely:
 - Flood risk: the Council's own SFRA (EB33) admits on page 12 that only part of the site is within the future tidal flood zone and that the remainder is within flood zone 1. Ruling out the site on flooding grounds is therefore inconsistent with the Council's own evidence base.
 - Gas pipeline: PHSC's Regulation 19 response contained an indicative masterplan showing how the site can be developed to avoid this constraint.
 - Landscape: the council's own evidence set out in the 2015 Landscape Capacity Study (EB26) concludes that the area in which the site is located (parcel ref. 41.4) has a medium/high capacity for development and medium/low overall landscape sensitivity. In fact, the study recommends reducing the site area and focusing towards the north, which '*could relate well to the settlement*'. PHSC's indicative masterplan submitted at the Regulation 19 stage in 2019 clearly showed built form to the north of the site. Therefore, ruling out the site in the 2020 SHLAA on landscape grounds is entirely spurious.
7. The site is also one of the few unconstrained sites shown in the Council's 2017 Constraints and Supply Analysis report (EB39).
8. As such the council's reasoning behind excluding the site is not justified and this serves to illustrate that the statement at paragraph 16 of the Sites Topic Paper (TP02) that '*the Council has gone to great lengths to 'leave no stone unturned' in identifying sites which are suitable for housing delivery*' is simply not true. Quite clearly, there is capacity for additional development in the borough to meet neighbouring unmet needs.

Q2.5 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?

9. PHSC believes that the prospects of achieving even a 4.2 year housing land supply on adoption of the plan are ambitious to the point of being unrealistic. Paragraph 67a of the NPPF makes clear that a five-year housing land supply must contain specific deliverable sites, i.e. available now; a suitable location for development now; and with a realistic prospect of delivery within five years. However, PHSC does not believe that all of the sites cited in appendix 2 of the Five Year Housing Land Supply Update (EB36) meet the definition.
10. For example, land West of Coldharbour Farm is expected to deliver 22 homes next year, with a further 22 the year after. Online records show that application ref. APP/19/01226 was submitted to the Council in 2019 and it remains undetermined. There is also an unresolved objection from the Environment Agency. Given the lead-in times involved in terms of

² See PHSC's response under ref. R258: https://planningpublicaccess.havant.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_246598

discharging conditions and site preparations, it is highly unlikely that 22 homes would be completed next year.

11. The Council has also decided to include emerging allocations within the five-year supply, such as 65 units from Havant College to be delivered next year. The site is clearly constrained, with a list of 11 technical reports set out in draft Policy KP8 for submission alongside a future planning application. Given the lead-in times for these reports; the application process itself; discharging of conditions; and the subsequent build out, it is highly unlikely any homes would be delivered from this source next year.
12. Similarly, 50 dwellings are expected from the former South Downs College carpark under Policy KP8 this year, with a further 45 the year after. In the absence of any live planning application, this is extremely unlikely.
13. The glossary to the NPPF makes clear that if a site is to be included in the five-year supply that only has outline permission or has been allocated (note: allocated, rather than even a draft allocation), there must be clear evidence that housing completions will begin onsite within five years. In the absence of any compelling evidence, PHSC has serious reservations that the sites identified in the five-year supply are truly deliverable and the figure of 4.2 years therefore seems overly optimistic.
14. The solution to this problem – which would also dovetail with meeting unmet needs arising from neighbouring authorities, as set out in PHSC's response to matter 1 – is to allocate additional small to medium sites, which paragraph 68 of the NPPF confirms '*can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly*'.

Q2.7 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates completions being delivered for Key Projects 1 and 2 in 2025/26. Are these realistic having regard to any landowner and infrastructure constraints for each project?

15. PHSC cannot find any reference to site KP2 in the housing trajectory, but notes the reference to Waterlooville Town Centre as being site TC2. This appears to be in error, as it should likely refer to KP2.
16. PHSC believes that the prospects of delivery from the Havant and Waterlooville town centre sites starting in 2025 are incredibly slim. As set out in PHSC's response to matter 1, Havant town centre is constrained by the historic core, while the redevelopment of Waterlooville town centre requires a complex land assembly across multiple ownerships and the use of CPO measures. Thereafter, planning applications would be required, along with the lead-ins for technical work and the subsequent discharge of conditions, etc. before work can even start. Indeed, paragraph 25 of the Strategy Topic Paper (TP01) notes that '*due to multiple landownership and development costs, [sites in Havant and Waterlooville town centres] are inherently more difficult to deliver*'.

17. In addition to the number of highlighted delivery constraints, including land acquisition and existing uses, a 'regeneration framework' plan is required to facilitate the implementation of this policy. It is likely that this would be a long-lead item, requiring multiple agreements.
18. As such, expectations of housing delivery from these allocations within the next four years seem very unrealistic.

Q2.8 Are each of the Key Projects 1 and 2 deliverable, including the number of dwellings envisaged (750 dwellings for Havant and 600 dwellings for Waterlooville)? What work has been done to estimate the expected number of dwellings from each area?

19. Policy KP1 (Havant Town Centre) contains a number of ambitious requirements, which will have significant lead-in times and will require collaborative working across many disciplines. For example, part f of the policy requires '*safe, convenient and welcoming road and railway crossings within and around the town centre*', which not only have to be engineered and designed, but also agreed with bodies such as Network Rail. In the absence of a Statement of Common Ground with Network Rail (or indeed a Regulation 19 response from the body), it appears a risky approach to enshrine such requirements in a policy without any confirmation they would be deliverable in theory.
20. Interestingly, Policy KP2 (Waterlooville Town Centre) requires '*mixed housing types, tenures, sizes that meet the needs of all*', but PHSC holds the view that town centres are where high-density developments are expected. The ability to meet the needs of all, i.e. delivering larger units suitable for families, would not be an efficient use of land. Indeed, the Council's Residential Density Evidence Paper (EB41) suggests on page 8 densities of 90dph in urban environments with an '*increasing proportion of flats and smaller dwellings*'. As such, that element of the policy alone does not appear logical or deliverable.
21. Having regard to the number of homes expected from each site, it is unclear how the figures were derived. There is no detail presented in the SHLAA (EB42) or the Residential Density Evidence Paper (EB41). Evidence of the Council's assumptions are vital in terms of calculations of site yield, phasing and overall deliverability, hence why the inspectors sought to unpick the Council's assumptions in their letter to the Council (CR09). The Council's reply (CR10) provides some detail in terms of funding, but completely avoids answering the question as to how the target number of homes was derived.
22. Whilst a wide area of Havant Town Centre is earmarked for regeneration, only two sites are considered as being suitable for housing: the Civic Campus and Market Parade. The town centre area was previously identified in the adopted Site Allocations DPD as having potential for only 225 dwellings. More recently, in 2016, outline approval was granted on the Market Parade site for 130 apartments. Despite the limited residential capacity, Policy KP1 of the emerging Local Plan identifies the town centre area as being capable of delivering 750 new homes within the plan period. There is little by way of evidence to justify the significant increase in residential capacity of the town centre sites since the time of the Site Allocations DPD. With regards to Waterlooville Town Centre, given the fragmented ownership, existing

uses and the potential for lengthy CPO processes, there are doubts as to the deliverability of the Council's vision for this site.

Q2.9 Does each key project meet the definition of developable within the NPPF?

23. The glossary of the NPPF makes clear that to be developable, sites should be in a suitable location for housing development, with a reasonable prospect that they will be available and viable developed (underlines for emphasis). 'Suitable' is not defined by the NPPF, but it suggests an appropriate location for development. In this case, the key projects comprise a mixture of regeneration sites (KP1-4); greenfield sites to deliver new homes (KP5); redevelopment of existing employment land to provide additional employment (KP6-7); redevelopment of existing educational facilities to provide improved facilities (KP8); and improvement of open space (KP9).
24. PHSC has reservations that KP3 (a collection of five sites on Hayling Island) passes the suitability test. This is because the Statement of Common Ground between the Council and the Environment Agency (SCG01) sets out how *'the Environment Agency remain concerned about flood risk in relation to the site allocations in the regeneration sites on Hayling Island'* to the point of stating that Policy KP3 is not sound. This is owing to the sites being *'at significant flood risk today, which may increase with climate change'*.
25. The Statement of Common Ground with Chichester Harbour Conservancy (SCG12) also highlights an objection to the allocation at Northney Marina under Policy KP3 on grounds of impacts on the AONB and sustainability grounds.
26. The allocations on Hayling Island therefore appear to not be in suitable locations for housing development.
27. Having regard to availability, PHSC has serious reservations that the land identified in Policies KP1 and KP2 in Havant and Waterlooville town centres are available. Indeed, the SHLAA entry (EB42) for the Havant Town Centre sites at ref. TC1 highlights *'site assembly issues'*, despite ticking the box marked 'developable'. A similar entry is found under SHLAA ref. TC3 in relation to Waterlooville town centre. Furthermore, as set out in PHSC's response to question 2.7 above, paragraph 25 of the Strategy Topic Paper (TP01) notes that *'due to multiple landownership and development costs, [sites in Havant and Waterlooville town centres] are inherently more difficult to deliver'*. KP1 and KP2 therefore do not appear to be available and therefore fail the NPPF's tests for a developable site.
28. Having regard to viability, PHSC notes that the evidence base contains the Havant Borough Council Local Plan CIL Viability Assessment (EB48) and a supplementary update note (EB49). The evidence purports to show that town centre developments will be viable, albeit at a reduced affordable housing requirement of *'not more than 20%'*. In PHSC's experience, a target of even 20% is ambitious, particularly when considering the heritage constraints present in Havant town centre, which will command high design standards and associated costs. Meanwhile, in the case of Waterlooville sites, the need to exercise compulsory

purchase powers could also result in delays and legal costs. This is all set against the backdrop of high existing use values experienced in town centre locations. The ability to develop viably is therefore questionable.

Q2.31 For the Plan to be consistent with national policy, does the Plan itself need to include a housing trajectory?

29. PHSC agrees that the plan itself should contain a housing trajectory, in order be consistent with paragraph 73 of the NPPF, which says '*strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period*'.