

Havant Local Plan EIP

Matter 2 – Housing: need, strategy, supply and deliverability

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ASHR3002

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1. Introduction

- 1.1 This Statement has been prepared on behalf of Markfield Investments Ltd in relation to Matter 2 of the Havant Local Plan Examination and their interests at land south of Havant Road, Emsworth (Site reference UE11).
- 1.2 This Statement is prepared in the context that the Local Plan is being examined against the NPPF 2019.

2. Response to Matter 2 (Housing)

Overall Spatial Strategy

Housing requirement (as set out within Policy DR1)

2.2 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?

- 2.1 As is made clear in the PPG, the standard method is a *minimum* starting point in determining the number of new homes needed in an area. Havant falls within the Partnership for Urban South Hampshire (PUSH) area which has a history of collaborative working. Statements of Common Ground (SOCG) have been submitted both with PUSH (SCG05) and Portsmouth City Council (SCG04a) which forms a key part of the PUSH area. It is noted in these SOCG that whilst earlier iterations of the Plan had included the delivery of housing to assist towards meeting the unmet needs of Portsmouth, the current iteration does not.
- 2.2 The PUSH SOCG confirms that there is a shortfall of nearly 11,000 homes across south Hampshire between 2020 and 2036. The SoCG with PfSH indicates that unmet needs will be considered in a future Joint Strategy following a review of the Spatial Position Statement. However, paragraph 61-022 of the PPG is clear that cross boundary matters, such as unmet housing needs, should not be deferred to subsequent plan updates.
- 2.3 This position is seemingly accepted by PUSH and Portsmouth City Council on the basis of the Council's stated contention that they have allocated all "*sites it considered available and suitable for sustainable development*" (CR08).
- 2.4 We do not consider however that the Council have allocated all available and suitable sites for development, with our client's site at Emsworth forming one such example. As will be highlighted later in this Statement, the Council must allocate a wider range of sites including smaller sites that can deliver in the early part of the Plan period.
- 2.5 Whilst the Council have sought to justify their failure to assist in meeting the unmet needs of Portsmouth it is considered that this is based on the flawed assessment of available sites. This has artificially restricted the apparent capacity of the Borough to accommodate additional growth. The Plan requirement figure is therefore not considered to be justified and the housing requirement should be increased above the standard methodology figure in order to seek to meet the unmet needs of Portsmouth City.
- 2.6 It is important to also consider whether there is a need to consider a further uplift in order to meet affordable housing needs. The Council state in the Specialist Housing Paper (EB38) that based on waiting lists from data published in 2017 there is a need for 2,735 new affordable homes – 26% of housing needs over the plan period.

- 2.7 However, this is based on those on waiting lists and does not take into account needs arising from the population as it grows over the plan period. The 2016 Objectively Assessed Housing Need Update (EB59) indicates in Table 49 that affordable housing need is *either 292 or 368 dpa* depending on the affordability threshold. This is between 58% and 74% of total housing needs. Whilst this evidence is somewhat out of date it does provide an indication as to the potential level of need for affordable housing beyond the waiting list data produced by the Council.
- 2.8 Given the viability challenges facing development in the area any improvement in the delivery of affordable housing can only come from the allocation of additional sites and gives further impetus to the reconsideration of sites that have been omitted from the Local Plan.
- 2.9 It is important in order to achieve sustainable development that the three objectives (economic, social and environmental) are appropriately balanced in mutually supportive ways. At this stage it is not considered that this balance has been struck as will be discussed further below. This adds further justification to the need to increase the proposed housing requirement above the minimum standard methodology figure.
- 2.10 In addition to ensuring the overall housing requirement is met, it is also important to ensure that the Local Plan is planning for the needs for all types of housing, as is required by the NPPF. Concern currently remains that the Council are failing to proactively plan for the delivery of retirement and specialist housing.
- 2.11 Whilst draft Policy H5 of the draft Local Plan provides clarity on the circumstances where proposals for retirement and specialist housing may be permitted, given the constraints to which the Borough is subject it is considered a missed opportunity that the draft Local Plan does not provide a more proactive response and no specific sites for such uses are identified in the Plan.
- 2.12 To support the emerging Local Plan the Council have prepared a Specialist Housing Analysis Report (July 2020, EB38). The Council's analysis identifies that there is a clear need to plan for suitable housing for the ageing population in Havant with about a third of the population of the Borough likely to be an older person by 2036 when based on the 2021 projection.
- 2.13 The Council have estimated the future needs for extra care housing as follows:

Figure 6: Estimated Future Needs for Extra Care Housing (2014 baseline)

	2014	2015	2020	2025	2030	2035
Sheltered Housing	1675	1713	1925	2288	2538	2813
Enhanced Sheltered/Extra Care	536	548	616	732	812	900
Registered Care	1474	1507	1694	2013	2233	2475

Source: Hampshire County Council

2.14 The report concludes that:

“Around 30% of the Borough’s population is expected to be aged 60 years or above by 2036 which means there is a clear need to provide dwellings which are sufficiently flexible for changing lifestyles and needs. It is recognised that it is better to build accessible housing from the outset rather than having to make adaptations at a later stage. This will enable older people to continue living in their own homes for longer and for extra care to be provided in situ.

Adaptable and accessible dwellings can also help to meet the needs of disabled people in the community where their need is not met by the existing built housing stock. Wheelchair user dwellings include additional features such as suitable circulation space and suitable bathroom and kitchens for wheelchair users.

For major development, it is therefore recommended that provision for adaptable and accessible dwellings are maximised within the constraints of viability. The Local Plan and CIL Viability Study indicates that for major schemes¹², 30% of new dwellings designed to meet the optional technical standard M4(2) are broadly achievable. Homes designed to meet the optional M4(2) standard should be equally distributed amongst all dwelling types and tenures to ensure they are integrated within the community.

To address the need for wheelchair accessible dwellings, it is recommended that 2% of the overall housing provision on larger development sites (of 50 dwellings or more) meet the optional M4(3) standard in accordance with locally identified need. This reflects the fact that only a proportion of disabled people will require a wheelchair accessible dwelling, and that the local authority is only able to require a wheelchair accessible home to be provided where it is able to allocate or nominate a person to live in that dwelling.”

2.15 Clearly this fails to take account of those whose needs cannot be met within an individual home environment, or indeed those that do not wish to live in such an environment and wish to live in a specialist facility to support their needs. The

Healthier and Happier Report by WPI Strategy for Homes for Later Living (September 2019) identified that *“people living in all forms of housing for older people have significantly greater well-being than those living in other types of accommodation.”*

- 2.16 In support of the Emsworth Neighbourhood Plan which will be subject to referendum in July 2021, the Emsworth Forum commissioned AECOM to prepare a Housing Needs Assessment (April 2016). This highlights that:

“The proportion of people aged 65 and over is significantly higher in Emsworth compared to Havant and England. The SHMA notes that there remains a significant market for retirement housing.

This is likely to result in a requirement for additional levels of care/support along with provision of some specialist accommodation in both the market and affordable sectors.”

- 2.17 It t concludes:

“The growing number of people over 60 living in Emsworth suggest a requirement for specialist housing for the elderly and/or disabled.

Specialist housing for the elderly, including smaller units suitable for independent living as well as more specialised housing types such as sheltered accommodation, need to be provided in appropriate locations within walking distance of services, facilities and public transport, recognising the accessibility requirements of the older population and the fact that care homes are also places of employment.”

- 2.18 It is therefore considered the overall housing requirement should be increased to ensure that the need for specialist accommodation is also met. Further allocations specifically for specialist accommodation should also be made to ensure the delivery of sites to meet such needs.

Housing trajectory & supply

2.5 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?

- 2.19 The Government has a clear objective of significantly boosting the supply of homes. The NPPF makes clear at paragraph 73 that:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their requirement set out in adopted strategic policies.”

- 2.20 To submit a Plan which will immediately fail this test, is a clear deficiency and is inconsistent with national policy. The failure to prepare a plan which is able to demonstrate a five year housing land supply across the plan period, on an ongoing basis, has been driven by the Council failing to allocate sufficient sites.

- 2.21 Clearly given the longer lead in times associated with large scale developments and brownfield sites, these will take longer to deliver. It is important therefore that the

Council allocate an appropriate portfolio of sites across the Plan period, including non-strategic greenfield sites in appropriate locations. It is considered our client's site at Emsworth is one such suitable site which has been incorrectly disregarded by the Council.

- 2.22 The Council's latest housing land supply statement (December 2020) indicates a shortfall of 293 homes over the period 2016-2020. It is clear therefore that not only will the Council have a shortfall in supply at the point of adoption of the Local Plan, they have been failing to meet their identified needs in recent years as well. Simply waiting until the latter part of the plan period to address these needs is therefore inappropriate and will result in an unacceptable further delay in delivering the new homes required, both market and affordable. Additional allocations should therefore be made which are able to be delivered in the early part of the Plan period.

Policies KP1 and KP2

2.7 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?

- 2.23 The Council provided further information on this matter in their response to Inspectors letter ID-04. The response states:

"The findings of the soft market testing will inform a new Outline Business Case which will be considered in June or July 2021. If approved, the Council will move towards securing new development partners for the agreed sites with a target end date of March 2022. A 9-12 month period is allowed for the preparation and submission of planning applications with a six month determination window. A further three month period to cover the KR period and discharge pre-commencement conditions would lead to a start on site of January 2024."

- 2.24 It is considered that this programme is at best ambitious. At the time of writing, no papers have been published to be considered in respect of the Outline Business Case. There is therefore uncertainty as to whether this hurdle in itself will be overcome. Based on our experience elsewhere we consider the timescales for the preparation and submission of the application and discharge of pre-commencement conditions to be unrealistic. We would also question whether the application itself can be determined and the Section 106 Agreement signed within a six month period. Any delays in the delivery of the site will further exacerbate the Council's already identified shortfall in five year housing land supply so it is imperative that the trajectory is realistic so the extent of shortfall in the early part of the Plan period can be appropriately planned for.

Policy KP5

2.18 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates completions being delivered from Policy KP5 Southleigh from 2025/26. Is this realistic, given that the Council has set out in their response (Ref: CR08) to our initial questions that it is unsure when highway improvements will need to be implemented to allow the delivery of homes on the site?

- 2.25 The Council's own response to the Inspectors questions has clearly demonstrated that the current proposed delivery trajectory is unjustified. At this stage the only scenario

that has been tested is the delivery of the scheme as a whole which does require the delivery of the link road. Not only does the evidence not demonstrate what level of development can be delivered ahead of the link road, it does not even identify whether any development can be delivered. There is therefore no evidence to support the Council's statement that the trajectory is "*ambitious but realistic.*"

- 2.26 Given our earlier comments regarding the Council's five year land supply and the uncertainty of the delivery of this site, it is considered this is further imperative to require the allocation of additional sites for delivery in the early part of the plan period.

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