

## Home Builders Federation

### Matter 2

#### HAVANT LOCAL PLAN EXAMINATION

##### Matter 2 – Housing

##### *Overall spatial strategy*

##### 2.1 Is the spatial strategy for housing justified?

No comment

##### *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?

We would agree with the Council's assessment as to the minimum number of homes that should be planned for in Havant over the plan period. The approach taken both plans forward on the basis of the standard methodology whilst recognising the need to address the undersupply within the period prior to the submission of the plan. The approach taken is consistent with paragraph 68-031 of PPG which states that under delivery may need to be considered where a plan is prepared part way through a plan period. The delay in submission clearly constitutes such a circumstance and as such we support the approach taken by the Council.

However, we do consider that the Council should be looking to plan for more homes on the basis of both paragraph 2a-010 and 2a-024 of PPG. Firstly, in relation to 2a-010 the Council agree that there are unmet needs in the neighbouring areas. This is clearly set out within the published statement of common ground with the Partnership for South Hampshire (SCG09). This SoCG states at paragraph 3.38 that there is a shortfall of nearly 11,000 homes across south Hampshire between 2020 to 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 PPG is clear that cross boundary matters, such as unmet housing needs, should not be deferred to subsequent plan updates. As such it is essential that the Council revisits any omitted sites and the Sustainability Appraisal consider whether any of



these should now be allocated for development or whether it is possible to expand sites already proposed to be allocated in order to meet some of the unmet needs that are currently expected across south Hampshire.

In addition to the stated unmet needs in neighbouring areas it is also important to consider whether a further uplift in supply is required to improve the delivery of affordable housing within Havant as is suggested by paragraph 2a-024 of PPG. 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. 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. As set out in our representations 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 need for affordable housing beyond the waiting list data produced by the Council. Given the viability challenges facing development in some areas 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.

*2.3 The Plan allocates some 149,940 square metres (sqm) of employment floorspace against an identified need of 86,919 sqm. Does this have any implications for housing need having regard for the need to balance jobs and homes?*

No comment

*2.4 The Specialist Housing Topic Paper (Ref EB38) identifies that in July 2019, there were 54 individuals on the Council's self and custom house build register. How will the Plan deliver this need?*

No comment

### ***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?*

As well as having a 4.2-year housing land supply for the 2020/21 to 2025/26 period the Council will also, as set out in Table 1 below, have a 4.5-year land supply in the five years from 2021/22 with the following year being only marginally above five years with 5.1-year land supply. This lack of housing in the early stages of the plan is a concern and one the Council must seek to address if the plan is not to be considered out of date during this period.

Table 1: Five-year land supply 2020//21 to 2022/23

|                                    | 2020/21 | 2021/22 | 2022/23 |
|------------------------------------|---------|---------|---------|
| <b>Deficit from previous years</b> | -307    | -290    | -128    |
| <b>Five-year requirement</b>       | 2,520   | 2,520   | 2,520   |
| <b>add deficit/ surplus</b>        | 2,813   | 2,827   | 2,810   |
| <b>Buffer</b>                      | 563     | 565     | 562     |
| <b>Total req</b>                   | 3,376   | 3,392   | 3,372   |
| <b>Five-year supply</b>            | 2,861   | 3,036   | 3,441   |
| <b>Surplus/deficit</b>             | -515    | -356    | 69      |
| <b>5YHLS</b>                       | 4.24    | 4.47    | 5.10    |

Ensuring that there will be a five-year housing land supply for the first five years of the local plan is a fundamental principle of planning making. A plan cannot be considered sound if on adoption it is immediately considered out of date on the basis of paragraph 11 footnote 7 of the NPPF. The Council must, in the first instance, consider whether there are additional smaller sites that could be allocated that will deliver in the first five years of the plan.

With regard to the identification of small sites, we could not find any evidence that the Council has met the requirement in paragraph 68a of the NPPF that at least 10% of the housing requirement, 1,043 homes, will delivered on sites of less than 1 ha that are allocated in the local plan or identified in the Brownfield Register. On the basis of the evidence set out in Table 4 of latest Strategic Housing Land Availability Assessment (EB42) there are 12 sites of less than 1 hectare allocated in the local plan which will deliver 238 homes. In addition, the Brownfield Register shows a further 605 units will come forward on sites of less than 1 ha. This is a total of 843 homes, around 8% of the housing requirement over the plan period and 200 homes short of what is required by national policy. It would be helpful if the Council could clarify whether there is any further evidence showing that the requirement of paragraph 68 will be addressed or whether additional allocations will be required. If the Council need to find additional allocations to meet the small site requirement it is likely that these sites would deliver early in the plan period and potentially address the lack of five-year land supply on adoption of the local plan.

2.6 The allocations and areas of search (KP Policies) add up to some 5,427 dwellings in total. Is the figure of 4,753 dwellings from the site allocations in Table 2 of the Plan, therefore, correct?

For Council

## Other housing land supply matters

2.28 The number of expected completions for some years between 20/21 and 24/25 (the five-year period) set out in the housing trajectory (Ref: TP01) and the Five-Year Housing Land Supply Update (Ref: EB36) differ. Why is this?

For Council

*2.29 Are the assumptions on windfall development in the trajectory justified and is any reliance on the redevelopment of redundant/commercial/leisure uses appropriate in this regard?*

When considering windfall allowance, it is important to ensure that Council's do not overestimate the potential from this level of supply as by its very nature it is difficult to predict how and when such sites may come forward. The Council have in part recognised this by reducing the overall windfall assumptions in each area by 10% and excluding large "one-off" developments. Whilst both of these adjustments are welcomed, we are concerned that they may still be overly optimistic and not be sufficient to address the inherent uncertainty with regard to windfall delivery.

With regard to the exclusion of one-off developments it is not clear from the evidence how many such sites were excluded from windfall sites and how many larger windfall sites remains within the windfall assumptions. It is therefore important to indicate within windfall assessment how much of that past windfall has come from major development sites as these sites tend to come forward less frequently following the adoption of a local plan. There is also a risk of double counting such development with the assumptions made with regard to the regeneration activities being proposed in this local plan and the housing supply expected from this activity. We would therefore recommend that a discount of 50% on the windfall allowance is included to ensure that there is not an over estimate of the contribution such sites make to meeting housing needs in full.

*2.30 Is the Windfall/Unidentified Housing Development Analysis and Justification Background Paper (Ref: EB45) robust?*

As set out above our main concern is the 10% adjustment that has been made. We do not consider this to be sufficient to offset the uncertainty with regard to the delivery of windfall sites. Rather than rely on the uncertainty of windfall delivery the Council should consider whether there are opportunities to allocate additional sites to ensure needs are met in full.

*2.31 For the Plan to be consistent with national policy, does the Plan itself need to include a housing trajectory?*

Yes. Paragraph 73 of the NPPF states that "*Strategic policies should include a trajectory illustrating the expected rate of delivery over the plan period*" and ensures that the Council's expectations with regard to the plan and expected delivery are clearly set out and transparent.

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