



# Havant

## BOROUGH COUNCIL

Public Service Plaza  
Civic Centre Road  
Havant  
Hampshire PO9 2AX

T 023 9247 4174  
F 023 9248 0263  
DX 50005 Havant

[www.havant.gov.uk](http://www.havant.gov.uk)

Provided by email to

[TechnicalPlanningConsultation@communities.gov.uk](mailto:TechnicalPlanningConsultation@communities.gov.uk)

Response to:

[planning.design@havant.gov.uk](mailto:planning.design@havant.gov.uk)  
[gary.hughes@havant.gov.uk](mailto:gary.hughes@havant.gov.uk)

**Enquiries to:** Cllr Gary Hughes

**Direct line:**

**Email:**

**My reference:**

**Your reference:**

**Date:**

1. Thank you for consulting the Council on *Changes to the current planning* system, linked to the White Paper *Planning for the future*. The paper and this response focus on the revised standard housing method which is subject to consultation until the 1<sup>st</sup> October 2020.
2. Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda and a history of swift action to get local plans in place. Nonetheless, as a small, constrained and heavily urbanised local authority, site availability to meet housing need is extremely limited. Havant Borough Council understands the Government's agenda to significantly boost housing supply. However, the proposed alterations to the standard method for calculating housing need, alongside a number of other aspects (which are considered in detail below) would create an unachievable housing figure for Havant Borough Council. As I'm sure you can appreciate, this is a worrying time and concerning position for many Local Planning Authorities (LPAs) and their local communities, particularly with the proposed abolition of the Duty to Cooperate as a means of meeting unmet housing need. The proposed revised standard housing methodology would mean an annual housing figure of 963 dwellings per annum for Havant Borough. This represents over a two fold increase (463 dpa) from the housing need figure included in the Regulation 18 Draft version of the Local Plan (which was consulted upon following the publication of the proposed standard method in 2018), and over a threefold increase (315 dpa) from the latest adopted housing requirement in the Core Strategy (2011). This is a significant increase which is unachievable within the constraints which exist, which are strongly protected by the Framework in terms of setting out where development should be restricted.
3. The emerging Local Plan demonstrates that it is able to meet the Borough's housing need (504 dwellings per annum), under the current standard method within the extent of environmental constraints which exist in Havant borough. However, this is only meeting the Borough's objectively assessed needs as a minimum, and with very limited flexibility over the plan period. This is despite the Council's efforts in continuing to assess the suitability of sites to ensure the Borough is able to meet its housing need throughout the production of the emerging Local Plan.
4. The Government's proposed approach to *Planning for Homes in the Right Places* consultation recognised the importance of ensuring that proposed housing need is as deliverable as possible ([paragraph 15](#)). It therefore extremely difficult to conclude the

housing need figure under the revised housing method of 963 dwellings per annum for Havant Borough would be achievable.

### **Revised Standard Method**

5. The housing need figure for Havant Borough derived under the existing standard method that has been applied to the Local Plan and the Council's housing trajectory is considered to be achievable. This is despite year on year increases to the objectively assessed housing need figure throughout the production of the emerging Local Plan (463, 479, 486 and 504 dwellings per annum in 2017/18, 2018/19, 2019/20 and 2020/21 respectively), and an increase in housing need figure by two thirds relative to the latest adopted housing requirement in the Core Strategy (315 dpa).
6. The proposed change in approach to use the latest projected annual household projections averaged over a 10-year period (as opposed to the 2014-based household projections) is supported in principle. However, it should be noted that further releases of projected household projections may lead to uncertainty for local planning authorities and local communities in planning to meet their housing need for their area. For example, the changes in assumptions in the 2016-based household projections lead to significant volatility due to the resulting much lower population projections. Further safeguards or other adjustments to the overall methodology are needed in order to provide certainty and stability in planning for housing delivery.
7. It is accepted the assessment of housing need should address the affordability of homes, and therefore projected household growth should be adjusted to take account of market signals. Nevertheless, the revised standard method does not provide any guidance about what a target affordability ratio should be. Furthermore, it fails to address the need to balance the social and economic need for housing with environmental constraints. The environmental constraints in Havant Borough mean there is a finite amount of land available for development in Havant Borough. However, these environmental constraints are also assets in making Havant Borough an attractive area to live, work and visit.

### **LPAs causing a delay to development**

8. The theme of this paper seems to be that Local Planning Authorities (LPAs) are delaying the process of development but Havant Borough Council do not consider that this is the case. To achieve beautiful and sustainable development, high quality homes are required with robust clear information and Havant is struggling to achieve this. As a council we prepared a local housing statement which identified sites which were considered capable of accommodating sustainable development in advance of the emerging local plan. This measure was used in order to meet housing need and ensure a five year supply. Measures such as these could be used more widely to enforce the current system and make it work. However this also shows a flaw which the new proposals would not address. Out of all of the sites in the Housing Statement, only two were granted planning permission under its jurisdiction as housebuilders delayed in submitting proposals for more than two years. Changing the housing figures that LPAs are required to achieve can only therefore be interpreted as the Government seeking to lower the quality of housing for the Borough and put simply, will not achieve the stated objectives in and of itself. Rather than increase the housing figures for LPAs, more incentives need to be provided to get agents to submit planning applications, of the quality needed and then, once planning permission is granted,

to swiftly start and developers building. Altering the standard method is only going to hinder all LPAs in achieving what the Government says it is trying to achieve - sustainable and appropriate development.

9. In April 2019 there were 1,701 dwellings with outstanding permissions which was enough to meet the Boroughs housing need figure (486) 3.5 times over but only around a fifth of these were built during 19/20 (366). This point is made to demonstrate how much Havant Borough Council are permitting and allowing development but of which, not all comes forward. This is not down to the current standard housing method but is the responsibility of the applicants and developers. Havant would suggest that further work needs to be done to incentivise developers to build, rather than significantly increase housing figures for LPAS which is not going to make development come any faster but will lower its quality and ultimately create places people do not want to live in.
10. Requiring developers to build is what is required, not increasing the housing to unachievable figures.

### **Duty to Cooperate**

11. Removing the duty to cooperate as a facility where housing can be shared across LPAs will act as an additional block to achieving sustainable development and the new required housing figures under the new standard method. Havant Borough Council would strongly advise that this is not removed as it currently provides a valuable facility and option for LPAs to support each other with housing. This is especially true when as a result of the new standard method some LPAs housing required has been reduced with others, like Havant, significantly increased.
12. Havant Borough Council will not be able to achieve nor provide 963 dwellings a year. Therefore as a result of the new standard method and having no mechanism to share development the Council will be forced to be in a position where it has to allow all forms of development anywhere in the Borough or potentially not have the robust evidence to defend such development at appeal and is allowed. This would have significant and defining impacts on the Borough which the Government must consider with such a change.
13. Even with this though, it will inevitably still not be enough to meet the new figure. Even if all omission sites for our emerging local plan were included (and there are robust reasons why each has not been), it would still not come even close to delivering this scale of housing.

### **Housing Cap**

14. Under the existing standard housing method a cap of 40% is applied to the local housing need to ensure the housing requirement does not increase over an unachievable amount. The proposed new standard method removes this mechanism for some modest control and would mean that an even higher amount of housing would and has been calculated. This is part of the reason and concern Havant's figures are as high as they are. It is strongly recommended that the cap is reintroduced in order to produce this safeguard.
15. Under the revised standard method, the Borough's housing need increases from 504 dwellings per annum to 963, an increase of over 42%. Whilst a cap would limit this to no

more than 704 dwellings per annum, it would be impossible to deliver this scale of housing having regard to the constrained nature of the Borough and finite land that is available.

16. Whether by coincidence or design, the cap also recognises that housebuilders will only release a certain number of new homes onto the market at any one point. They will obviously not flood the market. Suggesting a doubling of housebuilding would flood the market. Unless requirements are in put into place to force the private sector to deliver new homes, which is ultimately not seen as achievable, the market will fall well short of the level of delivery required.
17. Maintaining a cap on increases to the need figure will mean that market dynamics are recognised in this process. A cap must be maintained.

### **Conclusion**

18. The Council is committed to building high level, quality, sustainable homes and this is achievable under the current standard method with even a modest buffer. As a Council we recommend it stays this way. We urge the Government to reconsider altering the standard method and maintain the current calculations. The consequences of the proposed changes would be significant for a Borough such as Havant. Furthermore, they are simply impossible to achieve. The council would suggest that if something is to be changed that the Government introduce safeguards to give mechanisms of control to the LPAs, including a cap on increases.
19. The current standard method also promotes and encourages development in urban areas rather than rural which the alteration of the standard method would force to be reconsidered. Maximising development in cities and large towns is in line with the three pillars of sustainable development enshrined in the NPPF and should be maintained through the standard method.

Yours faithfully

Cllr Gary Hughes  
Deputy Leader of the Council and Cabinet Lead for Planning, Hayling Seafront Strategy  
and Commercial Services