



Appendix 1

Housing Delivery Action Plan

January 2021

Housing Delivery Action Plan

Purpose of this paper	To identify the reasons for housing under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.
Why?	A Housing Delivery Action Plan is required to be published where the Housing Delivery Test indicates that delivery has fallen below 95% of the Council's housing requirement over the previous three years.
Objectives	<ul style="list-style-type: none">• To assess the causes of under-delivery.• To identify actions to increase housing delivery in future years.

Any queries about the report should be sent to:

Email policy.design@havant.gov.uk

Telephone 023 9244 6539

Address: Havant Borough Council
Public Service Plaza
Civic Centre Way
Havant
PO9 2AX

Contents

Page

1. INTRODUCTION	1
2. THE EMERGING LOCAL PLAN	4
3. HOUSING DELIVERY ANALYSIS	5
3. KEY ACTIONS AND RESPONSES	11
4. MONITORING.....	13

1. Introduction

- 1.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery for plan-making authorities.
- 1.2 The National Planning Policy Framework (NPPF) states that: *“Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.”*
- 1.3 This action plan identifies reasons for housing under-delivery and sets out measures the Council is taking to reduce further under-delivery and improve delivery going forwards. It has been prepared as a proactive response to the anticipated 2020 Housing Delivery Test measurement.

Background

- 1.4 Havant Borough Council has an established reputation as an ‘open for business’ local authority. It engages positively with the development industry and local communities to realise the benefits that sustainable development can bring. Despite this out of the 1,701 dwellings with outstanding planning permissions at April 2019, only 267 dwellings (16%) were completed during 2019/20. Housing delivery has also been compounded by nutrient neutrality over the last 12-18 months, with an estimated 242 homes directly stalled and a further 409 significantly or principally backlogged by this issue as of February 2020.
- 1.5 Being a pro-development local authority, the Council has an ambitious regeneration agenda and a proven history of swift action to get Local Plans in place. Indeed, the Council took the decision to review the Local Plan, including the adopted housing requirement figure in the Core Strategy (2011) in 2016.
- 1.6 Since embarking on the Local Plan review, the objectively assessed housing need figure for Havant has risen from 450 dwellings per annum (PUSH Strategic Housing Market Assessment) to 504 dwellings per annum (dpa)¹ using the standard method (using 2020 as the baseline). This compares with the adopted housing requirement figure of 315 dpa in the Core Strategy (2011). As such, the Council has been expected to deliver a significant step change in housing delivery in a relatively short period of time.
- 1.7 The Council consulted on a Regulation 19 Local Plan at the beginning of 2019 and had hoped to submit in the Autumn of that year. However, there has been a near 18-month delay in submitting the Plan due to the need to respond to the Dutch Case and ensure that all new development can be nutrient neutral. As a result, there has been a need to extend the plan period by a year (and meet an additional year of housing need) and take account of further increases to the local housing need figure under the standard method. Nevertheless, having now successfully secured a strategic

¹ [Havant Borough Council – Assessing Housing Need for the Plan Period 2016-2037](#)

mitigation solution for nutrient neutrality, the Council anticipates submitting the Plan for Examination in the first quarter of the 2021 calendar year. This is set out in further detail below.

The Housing Delivery Test

- 1.8 The HDT was introduced following the publication of the 2017 Housing White Paper² and was designed to hold local authorities to account in terms of ensuring the delivery of new homes in their area. This was to counterbalance the suite of measures given to local authorities to ensure developers build homes quickly.
- 1.9 Depending on the measurement of housing delivery under the HDT, a different set of policies from the National Planning Policy Framework (NPPF) apply:
- The authority is required to publish an 'action plan' if housing delivery falls below 95%;
 - Together with an action plan, a 20% buffer is required to be added to the five-year housing land supply requirement if delivery falls below 85%; and
 - Together with an action plan and 20% buffer, there is a presumption in favour of sustainable development if housing delivery falls below 75%.
- 1.10 Notwithstanding the transitional arrangements, the previous HDT measurements for Havant Borough were 147% in February 2018, and 101% in February 2019 respectively. 2020 is expected to be the first year in which the HDT has necessitated the preparation of an action plan. Whilst the HDT results are not yet published, the Council has the ability to prepare an action plan at any point and has done so accordingly.
- 1.11 Housing delivery is complex, and whilst this action plan sets out what the Council is doing to increase housing delivery, there is only so much within its control. It is the Council's opinion that it is also incumbent on landowners and developers to ensure housing sites come forward in a timely manner, and are built out swiftly once planning permissions are granted.
- 1.12 This action plan will be updated annually following the publication of the Government's Housing Delivery Test results each year for so long as housing delivery falls below 95% or there is a change in Government policy which removes the requirement to prepare an action plan.

The measurement

- 1.13 The 2019 HDT results were published in February 2020 and indicated a measurement of 101% for Havant Borough. The 2020 HDT are not yet published but are expected to indicate a measurement of less than 95% and the need for an action plan is therefore anticipated.

² [Department for Communities and Local Government – Fixing our broken housing market – February 2017](#)

Decision taking

- 1.14 The NPPF indicates that there is presumption in favour (paragraph 11d) applies to applications involving the provision of housing, and suggests that policies which are “most important” (usually housing policies), for determining the application are out of date where:
- The local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or
 - Where the Housing Delivery Test indicates that housing delivery is less than 75% over the previous three years.
- 1.15 The Five Year Housing Land Supply Update (December 2020) indicates the Council is not currently able to demonstrate a five-year supply of deliverable sites.
- 1.16 However significantly it does not follow that there is a tilted balance in favour of permission being granted. Nor that the “most important policies” should not be afforded any weight. Planning applications should therefore continue to be determined in accordance with the development plan unless there are material considerations which indicate otherwise.
- 1.17 On this basis, the Havant Borough Local Plan (Core Strategy) (2011) and Havant Borough Local Plan (Allocations) (2014) together with the Hampshire Minerals and Waste Plan (2013) should continue to form the basis for determining planning applications in Havant Borough until such time the Havant Borough Local Plan is adopted. In the interim, the direction of travel set out by the 2020 Pre-Submission Local Plan is also a significant material consideration.

2. The emerging Local Plan

- 2.1 The Council adopted a [Local Plan Housing Statement](#) in December 2016 which was the first step in reviewing the Local Plan. It was in force for just over two years and provided a clear position statement as to which sites the Council considered could deliver sustainable development to boost housing supply whilst the Local Plan was in production. The Housing Statement recognised the requirement for the Council to review the latest adopted housing requirement and prepare a Local Plan that would meet the full objectively assessed need (OAN) for housing in its area. It represented an innovative approach to the start of the Local Plan review by identifying sites for 'early release' in advance of the Local Plan being adopted.
- 2.2 The Local Plan Housing Statement sent out a clear message that the Council was open to considering proposals for high quality development schemes on sustainable sites outside of the development plan, whilst it was in the process of being reviewed. Having the Local Plan Housing Statement in place enabled planning permission to be granted on two of the sites identified within it, in addition to pre-application engagement and application submissions on several more.
- 2.3 Whilst the Plan has subsequently progressed to Regulation 19 stage, due to delays outside of the Council's control, it has not been possible to progress to submission until this point. As a result, there has not only been a need to extend the plan period (to 2037) but provide sufficient housing sites to meet an increased minimum annual housing need figure of 504 dpa³. As a result, the buffer is reduced from 971 homes included in the 2019 version of the Pre-Submission Local Plan to just 340 homes now as set out in the 2020 consultation on changes to the Pre-Submission Local Plan.
- 2.4 In addition to the above, the emerging Local Plan sets out how the Council is taking an interventionist approach to regeneration of its town centres and Hayling Island Seafront in order to meet housing need, with the Council playing an active role in development opportunities. This includes substantial high-density residential development in order to maximise their public transport. However, land assembly and viability issues mean that these sites are likely to have long lead-in timescales but are areas which can contribute and support the Borough's housing need.
- 2.5 The small, constrained and heavily urbanised local authority means site availability to meet housing need is extremely limited within Havant Borough. The Council's [Constraints and Supply Analysis](#) provides some on the context of the finite amount of undeveloped land available for development in Havant Borough.
- 2.6 Added to this, land values in the Havant area in particular are suppressed compared to much of the Solent. This creates significant difficulty in bringing forward development schemes, particularly regeneration schemes which are a priority for the Council to provide transformational change in the town centres and provide much needed new housing.
- 2.7 Whilst the 2020 Pre-Submission Local Plan identifies sufficient sites to meet Havant Borough's objectively assessed needs, the Council has had to persevere in assessing the suitability of land to get to this point. The following section provides an analysis of housing delivery over recent years and identifies reasons for this under delivery.

³ See [Assessing Housing Need for the Plan Period 2016-2037](#)

3. Housing Delivery Analysis

Constraints and Supply

- 3.1 Havant Borough is tightly constrained by its boundaries and therefore the scope for new growth is limited. However, the extent of environmental constraints and designations in the Borough also means that there is only a finite amount of undeveloped land which is suitable for development. As such, there has been a need to maximise the potential for housing delivery within Havant Borough so far as sustainable development can still be achieved.
- 3.2 The 2020 Pre-Submission Plan identifies sufficient sites to meet its objectively assessed need of 10,433 homes over the plan period⁴, with a buffer of 340 homes equivalent to 3.2% of overall need. Whilst the scale of the buffer is less than ideal⁵ to provide flexibility to changing circumstances, the Council has continued 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. Indeed, the Council has not only bridged the gap between the need and supply identified by the Housing Statement but demonstrate that it is able to meet its objective assessed need of 504dpa, two thirds greater than the adopted housing requirement of 315 dpa.

Sites contributing to housing supply

Sites identified through the Housing Statement

- 2.2.1 The [Housing Statement \(December 2016\)](#) identified a need for 11,250 homes between 2011 and 2036. Taking completions, outstanding planning permissions, windfall, as well as sites allocated in the Allocations Plan (2014) into account, the Housing Statement indicates that there were 6,441 homes already planned for at this point. Significantly however, there was still a need to find sites for 4,809 homes based on the objectively assessed need at the time.
- 3.3 In order to address this gap, further sites on greenfield and previously developed urban extension sites were considered, and subsequently identified as being suitable for 'early release' through the Housing Statement.
- 3.4 Table 2 of the Housing Statement (re-produced from the Housing Statement) below shows the ten sites which the Council indicated that it would support the principle of residential development ahead of the adoption of the Havant Borough Local Plan, subject to compliance with the remainder of the policies in the Adopted Local Plan and the Guiding Principles in the Housing Statement.

⁴ [Assessing Housing Need for the Plan Period 2016-2037](#)

⁵ Having been reduced from a buffer of 971 homes in the 2019 Pre-Submission Local Plan

Site reference	Site	Indicative No. of dwellings	Identified 'Other Development Uses'*
Emsworth			
UE67	Land to the rear of Redlands House	5	
UE76	Land North of Long Copse Lane	260	
UE02b	Land North and West of Selangor Avenue	154	
Havant and Bedhampton			
UE28	Littlepark House, Bedhampton	47	
UE30	Land South of Lower Road, Bedhampton	50	
UE53	Land East of Castle Avenue	60	
UE55	Southleigh Park House	35	
UE68	Forty Acres	300	Allotments
Waterlooville			
UE70	Land East of College Road, Campdown	350	Sports facilities
UE72	Land North of Fort Purbrook, Campdown	100	
	Total	1361	

Table 2: Further greenfield and previously developed sites outside of the urban area suitable for 'early release'.

- 3.5 The table shows that the ten Housing Statement sites had the potential to deliver 1,361 dwellings, with an additional 65 dwellings on newly identified, smaller sites within the urban area. The Housing Statement therefore identified a total of 7,867 homes⁶, including completions and outstanding permissions. At December 2016, there was therefore still at least an anticipated 3,383 new homes to find sites for. It should be noted that Land North of Fort Purbrook and Redlands House were not subsequently taken forward as allocations in the Local Plan, but the latter has subsequently been built out (APP/18/00229 and APP/18/00230). The former is no longer available for development⁷.
- 3.6 The Housing Statement also identified Southleigh as a strategic site for the first time that would be explored further through the Local Plan's preparation process.
- 3.7 Whilst the Housing Statement reduced the shortfall, the Position Statement indicated a significant gap between objectively assessed need for housing and the available supply. Furthermore, the Housing Statement made clear the Council's intention to continue to search for additional sustainable sites when formulating the new Local Plan, with the aim of fully meeting the objectively assessed need (see paragraph 4.2).
- 3.8 Since the release of the Housing Statement in December 2016, three of the ten sites have been granted planning permission⁸ with the potential to deliver 556 dwellings. Yet Land North and West of Selangor Avenue (APP/16/00774) and is the only site to have subsequently commenced and have

⁶ Table 4 of the [Local Plan Housing Statement](#) (December 2016)

⁷ WV109 in the Council's [Strategic Housing Land Availability Assessment](#)

⁸ Land North and West of Selangor Avenue (reference APP/16/00774), Southleigh Park House (reference APP/17/00863) and Forty Acres (reference APP/18.00450).

been built out (146 dwellings), representing just 10% of the total development potential from the Housing Statement sites. Forty Acres (APP/18/00450) has commenced but there are yet to be any completions.

- 3.9 None of the other Housing Statement sites came forward whilst the Position Statement was in place. This was disappointing given the innovative approach taken by the Council in adopting the Housing Statement at the start of the Local Plan review. However, several other sites were either progressed at the pre-application stage or submitted as planning application. Four Developer Consultation Forums were held for Housing Statement sites whilst the Position Statement was in place⁹.
- 3.10 The Housing Statement is a testament to the Council's concerted efforts to assess and identify every potential site that can deliver sustainable development. However, it shows that whilst the Council can front load the process by identifying suitable sites for housing delivery, it cannot guarantee that they will subsequently come forward for development and/or that they will be built out swiftly once planning permission has been granted.

Proposed allocations in the emerging Local Plan

- 3.11 Planning applications on a few other Housing Statement sites have since been submitted¹⁰. However, they have done so in the context of proposed allocations in the emerging Local Plan, some two years after the Housing Statement. Only Land East of Castle Avenue (reference APP/18/01033) has resolution to grant planning permission, subject to successful completion of a Section 106 agreement.
- 3.12 Camp Field, Bartons Road is a proposed allocation under Policy H18 in the emerging Havant Borough Local Plan. It was granted outline planning permission (reference APP/19/00007) for up to 72 dwellings in October 2020. Significantly, it is an example of a site which was not previously identified by the Housing Statement. Similarly, land rear of 15-27 Horndean Road, Emsworth is now also a proposed allocation under Policy HX' in the changes to the Pre-Submission Local Plan, and has resolution to approve planning permission subject to Section 106 (APP/19/00768). The Council was willing to support the principle of development on both of these sites in advance of the Local Plan being adopted.
- 3.13 Whilst in such cases it is expected that proposals comply with the new requirements and standards in the emerging Local Plan, it is further evidence that the Council is doing everything it can in order to boost housing delivery in Havant Borough.

Analysis of housing completions 2017/18-2019/20

- 3.14 Given that there has been relatively limited progress on the delivery of sites identified through the Housing Statement, it is relevant to analyse the sites which have contributed to the Borough's supply in recent years.
- 3.15 For the purposes of this exercise, sites have been broken down into small (0-10 dwellings), medium (11-15 dwellings) and large (15 dwellings) categories.

⁹ <https://www.havant.gov.uk/development-consultation-forums>

¹⁰ Land South of Lower Road, Bedhampton; Land East of Castle Avenue; and Land East of College Road, Campdown

Table 2: Analysis of completions according to contribution from site size

Number of Completions	2017/18	2018/19	2019/20
Small (1-10 dwellings)	90	84	53
Medium (11-15 dwellings)	14	13	0
Large (15 or more dwellings)	186	170	303
Total	290	267	356
Percentage of smaller sites	31.0%	31.5%	14.9%
Percentage of medium sites	4.8%	4.9%	0.0%
Total	35.9%	36.3%	14.6%

- 3.16 The analysis shows that medium and small sites, and especially the latter have made a consistent contribution to housing completions, with them contributing to over a third of housing completions during 2017/18 and 2018/19 respectively. Whilst the table shows this figure dropped to 15% (rounded) in 2019/2020, this would appear to be an anomaly.
- 3.17 Nutrient neutrality has been stalling development over the last 12-18 months – particularly on non-agricultural sites which are unable to provide mitigation on-site and therefore need to provide mitigation off-site. By implication large sites (15 dwellings or more) have made an even greater contribution to housing delivery in 2019/20. Sites on agricultural land are able to provide mitigation solutions on-site and have therefore delivered without constraint. This issue is considered in further detail below.

Cause analysis

Nutrient neutrality

- 3.18 Nutrient neutrality has had a huge impact on development activity across the Solent, including in Havant borough. As such, the Council has only been able to permit only a very small number of new residential applications in exceptional circumstances between 1st April 2019 and 18 August 2020. This follows the Dutch Case in late 2018 which means that there is a need for development resulting in a net increase in overnight accommodation to prevent any net increase in nutrients. As such mitigation is needed in order to prevent a likely significant effect on the integrity of Solent European. In other words, development has to show that it is 'nutrient neutral'.
- 3.19 The Council's Cabinet approved the Position Statement on Nutrient Neutral Development (June 2019) on the 26th June 2019 which recognised the need for new development to achieve nutrient neutrality. For development on sites currently used for agricultural purposes, it was recognised that it is possible for nutrient neutrality to be achieved on-site. However, for development on non-agricultural sites, particularly brownfield sites, it was acknowledged that it would not be possible for mitigation to be provided on site.

- 3.20 The 2019 Position Statement highlighted a range of mitigation and avoidance measures which the Council was considering as a strategic mitigation solution at the time. It also put in place a short-term mechanism to enable development to continue to come forward through the use of a Grampian condition. The Grampian condition was used to secure an appropriate avoidance and mitigation package in the form of a proportionate, but unknown scale of financial contribution to be secured prior to the occupation of the residential unit.
- 3.21 Whilst the Council has no control over this issue as a constraint to development, it also recognised the need for a proactive approach to the issue and the need to fulfil its obligations under the Habitat Regulations. The Council subsequently developed its own bespoke solution to addressing nutrients and launched its own strategic mitigation package at Warblington Farm in August 2020. The Council's mitigation scheme is made available through the [Position Statement and Mitigation Plan for Nutrient Neutral Development \(August 2020\)](#), which supersedes the previous Position Statement.
- 3.22 Nevertheless, there has been a significant backlog of outstanding planning applications for the last 18 months where nutrient neutrality is the only issue which needed to be addressed. As of February 2020, 242 homes were directly held up by the need to be nutrient neutral whilst a further 409 were significantly or principally backlogged because of this¹¹. As such, nutrient neutrality is identified as having been a significant constraint to housing delivery over the last 12-18 months.

Macro-economic uncertainty and Covid-19

- 3.23 The impact of nutrient neutrality on housing delivery in Havant borough has been compounded by macro-economic uncertainty with the UK's exit from the European Union. Whilst the five-year land supply and HDT are intended to incentivise housing delivery, these macro-economic circumstances are out of the Council's control.
- 3.24 Whilst completions were relatively higher in 2019-20 (366 dwellings) than in 2017-18 (290 dwellings) and 2019-20 (267) respectively, this can largely be attributed to planning permissions on allocated sites being built out. Completions in 2019-20 represented only 16% of the total outstanding permissions at April 2019 (1,701 dwellings). This was more than enough to meet the Borough's annual local housing figure for 2019 (486 dwellings) by 3.5 times over.
- 3.25 Whilst the completions figures are not yet known for the 2020-21 financial year, it should be recognised that the current healthcare crisis will undoubtedly affect housing delivery. From 1 April 2020 to 10 June 2020, the Council only received £20,000 of Strategic CIL income compared to the same period in 2019 in which the Council received over £700,000. This was largely due to delayed payments as a result of Covid-19. This will obviously significantly affect the Borough's ability to deliver the infrastructure needed to support sustainable new growth going forwards.

Summary

- 3.26 The Council has no control over either of these issues, yet the Council is still held to account by virtue of its housing land supply position .
- 3.27 The twin pressures of the Dutch Case requiring new development to be nutrient neutral and the macroeconomic uncertainty even before the Covid-19 pandemic have undoubtedly affected the

¹¹ This matter was considered by the Partnership for South Hampshire's Joint Committee on 10 February 2020 - <https://www.push.gov.uk/wp-content/uploads/2020/01/FINAL-Nutrients-Update-Joint-Committee-10-February.pdf>

Borough's ability to deliver housing. Whilst the Council sought to counterbalance with the former through publication of the Housing Statement which identified sites for 'early release' there has been relatively limited uptake from development industry in response, and not enough homes have been delivered on the ground as a result.

- 3.28 The following section sets out the steps and actions the Council is taking to address the under delivery and boost housing supply in Havant Borough.

4. Key Actions and Responses

Submitting the Local Plan

- 4.1 The Council has been working on preparing the latest Local Plan since 2016. Indeed, the Council is in an unusual scenario having consulted on a Pre-Submission Local Plan at the beginning of 2019 but has not yet been able to submit the Plan for Examination. A need to respond to the Dutch case and ensure that all new development is nutrient neutral has led to a some 18-month delay in the Council being able to reach this stage.
- 4.2 Consequentially, there has been a need to extend the plan period from 2036 to 2037 and meet an additional years' worth of housing need. There has also been the need to take account of marginal increases to the Borough's local housing need figure under the standard method (which is calculated on annual basis). Since embarking on the new Local Plan, the Havant Borough has seen an increase from 315 dwellings per annum as per the adopted housing requirement in the Core Strategy to 450 dwellings in light of updated evidence in 2016. Indeed, since the publication of the Government's standard method, Havant's housing need has steady increased from 463 dpa in 2017¹² to 504 dpa in 2020¹³.
- 4.3 Following consultation on the proposed changes to the Pre-Submission Local Plan between Havant 3rd November and 17th December 2020, the Council anticipates the submission of the Local Plan in the first quarter of the 2021 calendar year.

Nutrient neutrality mitigation

- 4.4 Havant Borough is one of the first local planning authorities to have secured an off-site strategic mitigation scheme to address this issue, which launched in August 2020. Alongside this, the Council undertook a marketing campaign including press releases and a Ministerial site visit to publicise the launch of the scheme to developers, investors and landowners. This is primarily targeted at development schemes where it is not possible to achieve nutrient neutrality on site.
- 4.5 The Council sees the implementation of the strategic mitigation package for nutrient neutrality as being key to enabling housing delivery and economic recovery after the current healthcare crisis.

A proactive approach to emerging allocations

- 4.6 The Council is already taking a proactive approach to the grant of planning permissions for the development of a number of Housing Statement sites, notably that of Selangor Avenue (reference APP/16/00774) and Forty Acres (reference APP/18/00450), in advance of the emerging Local Plan gaining full weight in decision-making.

¹² As per the MHCLG [Planning for the Right Homes in the Right Places: consultation proposals](#)

¹³ [Assessing Housing Need for the Plan Period 2016-2037](#) (August 2020)

- 4.7 Significantly, the Council is also accepting the principle of development on proposed allocations in the emerging Local Plan where they meet the other requirements in the Plan. This is primarily assessed through a Statement of Conformity in which the applicant demonstrates how they have complied with the requirements in the emerging Local Plan. Camp Field (policy reference H18) is an example of this, being an emerging allocation having not previously identified as a Housing Statement but was granted outline planning permission (reference APP/19/00007) in October 2020.
- 4.8 In an effort to boost housing delivery with the Borough, the Council proposes to make contact with landowners and developers with emerging allocations to establish the likely timescales for pre-application and application submissions. This will be undertaken as part of maintaining an up-to-date housing land supply in Havant in a bid to increase housing delivery in future years.

Summary

- 4.9 As a pro-development authority, Havant Borough is doing a great deal to boost housing supply and get housing sites delivered. However, it can only do so within the physical and environmental constraints which exist – and therefore the Local Plan is key in setting out a strategy for sustainable development. It is therefore envisaged that the submission, examination and adoption of the Local Plan will provide greater certainty for the market in terms of how and where homes should be delivered.
- 4.10 Nevertheless, a strategic off-site mitigation scheme for sites unable to achieve nutrient neutrality on site will also be key to increasing housing delivery in the Borough, particularly as small and medium sites have previously made a consistent contribution to supply. The Council's strategic mitigation package provides a simple and cost-effective way of mitigating the impact of nutrient neutrality, and there is not an insignificant number of schemes that have been stalled in the system as a result of this issue. It is therefore key that the Council continues to promote this as a mitigation option.

5. Monitoring

- 5.1 The Council will continue to monitor housing completions and have a significant involvement with all planning applications coming forward to ensure housing numbers and densities are delivered as per expectations in the Local Plan. The monitoring of housing completions shall continue to be undertaken on annual basis to inform the HDT measurement.
- 5.2 The Council will also monitor the take-up of the strategic mitigation package at Warblington. This should include many of the schemes previously stalled by the issue of nutrient neutrality. Whilst there has been a slow but steady take up of the scheme since its launch in August, demand for the mitigation has likely been moderated by the impact of Covid-19 and economic uncertainty. The Council will, however, continue to promote the mitigation scheme to developers and landowners, making it clear that Havant Borough is “open for business”.
- 5.3 The Council consulted on a number of proposed changes to the Pre-Submission Local Plan in late 2020 and anticipates submitting the Plan for Examination in the first quarter of 2021. This Council considers the Plan to be “sound” in its current form and demonstrates that it is able to meet its objectively assessed needs in full, with a buffer to provide flexibility for rapid change. This will be kept under review pending the conclusion of the White Paper consultation, and proposals to revise the standard methodology.