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Working locally and
nationally for a beautiful
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Registered charity number 1164410

Havant Borough Council
Planning Policy Team
Public Service Plaza, Civic Centre Road
Havant, Hampshire, PO9 2AX

8th September 2016

Dear Sirs,

Response to the Havant Borough Council Draft Local Plan Housing Statement

Please find below the comments of CPRE Hampshire on the Havant Draft Local Plan Housing Statement. We would welcome a continued involvement in the process and request that you keep us informed of the progress of the Plan through to an examination, at which we would like to appear, in particular on the issues of housing numbers and spatial strategy.

In summary, CPRE Hampshire is a registered charity and its objectives are to promote and encourage for the benefit of the public the improvement, protection and preservation of the countryside of Hampshire and its towns and villages, and the better development of the rural environment.

We have evaluated the Havant Borough Council Draft Housing Statement (July 2016) as well as the PUSH Spatial Position Statement (June 2016) and the GL Hearn Objectively Assessed Housing Need (OAN) Update (April 2016). We would like to give our support for the Councils endeavours to prepare an up-to-date Local Plan, and to encourage them to engage with their local communities and listen to their comments. However, we are extremely disappointed that this important consultation took place over the holiday period. As a charity manned by volunteers, all of whom have other commitments, CPRE has been unable to devote as much time for detailed scrutiny as we would like. We urge that the deadlines for all future consultation exercises be extended, and the timing arranged not to be during holiday periods, so to enable our members to be more fully informed.

In general, CPRE does not see that the Housing Statement provides a robust approach to the three dimensions of sustainability as laid out in Para 7 of the NPPF. The draft as it stands is in conflict with both the social and environmental tenets. Additionally, we do not see that the core land-use planning principles as described in Para 17 have been achieved. More effort should be made in the plan process to ensure the vitality of the existing older urban areas in Havant as set out in Para 23 of the NPPF. Of fundamental concern is the fact that the Housing Statement has provided no reasonable alternatives or options, and cannot therefore be shown to be the most appropriate strategy and as a result it may not meet the test of soundness as described in Para 182 of the NPPF.

Furthermore, if the Council is to truly provide an up-to-date plan through to 2036 based on justified evidence then two things must happen; firstly, the OAN figures need to be updated in the light of the recently released household projection figures from the ONS. Secondly, the PUSH Position Statement and OAN figures need to be tested by consultation and then by examination in public.

As regards the publication of the updated Household Projections, para 1.7 of the PUSH OAN Update confirms that the figures used were the 2012-based projections, which had not at that point been superseded. On 12 July of this year, they were superseded by the 2014-based figures, and therefore the policy-off calculation of OAN will need to be reviewed. The newer projections for Havant by the year 2036 show a minor decrease from 60,230 to 60,123 households, a drop of 107 compared to the earlier figure. Whilst minor, it does emphasise that calculation of changes in household projections is

not always a one-way street. Across the SHMA area of PUSH East the difference is slightly more marked.

There seems to be a discrepancy in the number provided in Table 1 of the PUSH Position Statement (pg 14) where Havant is recorded as having an OAN of 11,250 from 2011-2036, which is the number used in the HBC Housing Statement, as compared to the number “allocated” in Table H1 of the Position Statement, where Havant’s distribution is 9,170 from 2011-2034. The difference of 2,080 cannot simply be attributed to the last 2 years from 2034-36, which is not credible. Para 3.24 of the Draft Havant Housing Statement does not adequately explain which number should be required and what the gap and either over/under supply might be. CPRE finds it difficult to understand why HBC has chosen to use the raw number and ignore the allocation reached after deliberations between 12 neighbouring authorities under the Duty to Cooperate.

In any event, to use the PUSH calculated OAN for Havant of 450dpa without this figure having been tested by consultation or by scrutiny by an Inspector is profoundly worrying. CPRE urges HBC to ensure that adequate testing of the figures underlying their Housing Statement is carried out forthwith to meet the tests of soundness as required, and that an examination is undertaken into the PUSH OAN report.

The PUSH SHMA was of course based on previous predictions. It is also important to note that ONS have made some changes in recent years in an attempt to make their forecasts more reliable: there is now better tracking of international migration inflows and outflows, and the quarterly labour force survey (LFS) data are used to pick up recent trends in household formation rates. This application of newer data makes the older projections less relevant.

In CPRE’s view LPAs need to be very cautious about deviating from the DCLG projections of need. The input ONS projections are normalised so that inflows and outflows for all districts sum up to the expected regional net migration and, in turn, the regional figures sum to the expected national net in-migration.

So any increase (above ONS projections) in a district will have to be balanced by a decrease somewhere else across the country, and the question about where will the extra people come from becomes even more relevant as LPAs all over England plan for more housing than called for by DCLG projections to meet economic aspirations that simply compete with the aspirations of other LPAs in the region. At some point it has to be recognised that this is just not credible. In our view it would be better if LPAs stuck with the DCLG projections but had flexible plans which allowed for future demographic changes. It cannot be sustainable, in NPPF terms, to allocate large areas of greenfield land for development that according to official projections will not be needed; and then if built out will attract yet more people into the Borough and exacerbate the difficulty of finding developable land in future years.

CPRE is in favour of all efforts to promote brownfield development and supports the Borough Council in its efforts in this regard, although we believe that there are more radical approaches to regenerating the older urban areas that they have not fully considered. There is goodwill, enthusiasm and funding available for urban regeneration, and we would like to see a more ambitious approach to evaluating the opportunities for redevelopment of part of Havant Borough. We can see no evidence that any attempt has been made to evaluate the potential for windfall sites over the plan period as set out in Para 48 of the NPPF.

However, recognising that some greenfield sites will be required over the next 20-year period, CPRE has evaluated the alternative options in terms of their impact on the countryside. Firstly, HBC must

take further account of any impact on the South Downs National Park to the north of the Borough. Omission would put HBC in breach of their statutory duty to have regard to National Park purposes under Section 11 A(2) of the 1949 National Parks and Access to the Countryside Act, and Section 62 of the 1995 Environment Act. Light pollution should be considered in particular in areas neighbouring or impacting on the SDNP in order to be in accordance with its emerging policies on light pollution. Para 125 of the NPPF says “By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

CPRE considers that the preservation of the remaining gaps in Havant Borough is important to its identity as a semi-rural borough. Without some of the existing gaps, it might be as well be one single urban sprawl. CPRE supports gaps in principle in order to prevent settlement coalescence. Reducing the gaps to the minimum will not serve the purpose for which the public envisage they are intended.

The current Statement shows almost all the remaining gaps being filled, and CPRE considers the suggested strategic sites to be horrendous, one on the gap between Emsworth and Denvilles, and the other breaching the previously inviolable Portsdown Hill. The former of these, near Southleigh Farm and Manor Farm is an important green corridor from Chichester Harbour to the SDNP via Southleigh and Stansted Forests.

CPRE Hampshire would urge HBC to be more ambitious in their use of brownfield land and to look at regeneration prospects in the older urban areas in order to minimise the requirement for these poor strategic sites. CPRE has campaigned for 50 years for a Green Belt to protect the rural hinterland bordering the urban areas of South Hampshire and we continue to promote that idea today. Para 82 of the NPPF allows for the establishment of new Green Belt in exceptional circumstances such as major urban extensions as proposed in the Housing Statement.

In view of the consultation over the holiday period, and the lack of examined evidence for the underlying OAN, and our concerns over the lack of any alternative options, this letter should be regarded as a holding letter from CPRE, and we may make additional comments on the housing numbers and their spatial distribution.

We request the addition of the following documents to the database, so that CPRE is able to refer to them in any subsequent inquiry.

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4145-smarter-shmas-a-review-of-objectively-assessed-need-in-england>

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>

<http://www.cpre.org.uk/resources/housing-and-planning/planning/item/4147-local-plans-submission-of-evidence-to-the-expert-group>

[2014-based household projections to 2039 for England](#)

Yours faithfully

CPRE Hampshire