

Sent by email to: [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk)

16/12/2020

Dear Sir/ Madam

**Response by the Home Builders Federation to the changes to the proposed submission Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the changes to Havant's Proposed Submission Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

**We would like to submit the following representations on the Local Plan, and we would welcome, in due course, participating in hearings of the Examination in Public.**

**DR1-01 – amendments to housing needs and supply**

Housing needs

The HBF welcomes the proposed amendment that updates the housing requirement to reflect the latest evidence regarding affordability ratios and the approach taken with regard to needs and delivery between 2016/17 and 2019/20. We recognise that the NPPF, and its associated guidance, states that Council's should calculate housing needs from the current year, and this could be construed to mean that this is the year from which to start the plan. However, PPG does consider at paragraph 68-031 the issue of under delivery where a plan is being prepared part way through a plan period. This paragraph states that under delivery "*may need to be considered*" in such a circumstance. Given that the Council have had to delay submission due to issue of nutrient neutrality the Council's approach would appear not only to be pragmatic but one that is consistent with national policy. However, as set out in our representations to the original proposed submission local plan, we continue consider it necessary for further consideration to be given as to whether additional sites could be allocated to better meet the areas needs for affordable housing and address any unmet needs likely to arise in neighbouring areas.

Our final suggestion with regard to housing needs is that the phrase "*Total objectively assessed housing need*" used in the first column and row of Table 2 be deleted and replaced with "*Minimum housing need*". Whilst a small amendment it ensures that a



distinction is made with the 2012 NPPF and the 2019 NPPF and ensure consistency with paragraph 60 of the latest Framework.

### Housing Supply

The Council's proposed amendments do not include a trajectory setting out the expected delivery of new homes across the plan period as required by paragraph 73 of the NPPF. This was a concern raised in our earlier representations and should be rectified prior to submission. We also note that the trajectory set out in the January 2019 Strategic Housing Land Availability Assessment (SHLAA) has not been included in the August 2020 update. We would also recommend that trajectories are provided for each allocated site. It is important that this information be included in the evidence to ensure effective scrutiny of the local plan and its deliverability across the plan period. Without this latest evidence we reserve the right to comment on the deliverability of any proposed housing trajectory during the examination in public.

The Council state in the revisions to paragraph 2.49 that there is a 340-unit buffer, around 2% of total needs, in the plan to ensure sufficient flexible to ensure needs are met in full. This is significantly fewer than the 971-unit buffer, around 10%, identified initially. We do not consider a 2% buffer to be sufficiently flexible to ensure that needs are met in full. We would recommend that as a minimum the Council maintain at least a 10% buffer to take account of delays in delivery over the plan period.

### **EX1-01 – Water Quality Impact on the Solent European Sites**

Whilst the HBF welcomes the mitigation measure introduced by the Councils across south Hampshire to address this barrier to development raised by Natural England's guidance on nutrient neutrality we are concerned that this places a further burden on development in this area. Given that this will have a financial impact on new development we are surprised that no further consideration as to the impact on the viability of new development was undertaken by the Council. We note in our initial representations that some forms of development in lower value areas are marginal and as such it is important to test the impact of these additional costs on such development and the deliverability of certain typologies.

It is also important to note that the additional impact of new residential development on nutrient levels is limited and should have been addressed by the relevant water companies through improvements in their infrastructure. As such the HBF would suggest that the Council include a commitment in this policy to review its position statement in order to take account of new evidence or improvements in local infrastructure.

### **Conclusion**

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you

require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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