

## **8Bii Housing and Countryside**

### **1. Is the proposed housing provision figure for the sub-region at the most appropriate level, taking account of social, environmental, economic and other factors.**

We have proposed amendments to the Plan's objectives, including the need to:

- plan positively for a buoyant economy.
- plan for everyone to have a decent home.
- provide sufficient residential land in the most sustainable locations.

To meet these, and be consistent with the RHS and RES, the overall housing figure must be increased to at least 36,000 dpa.

It would therefore be appropriate for the sub-region to accommodate increased housing provision. Pro-rata this would mean 5,100 dpa (total 102,000). However the Roger Tym Report, which independently considered social, environmental and economic factors, identified positive benefits to South Hampshire if the housing level be increased above pro-rata:

- Higher levels of growth will tend to provide more affordable housing, address affordability concerns, stimulate greater economic growth and provide a better range of facilities. Positive effects on regeneration are more likely (summary paragraph 54). Option D, will have the greatest positive effect on economic revival in those sub regions which contain Priority Regeneration Areas (main paragraph 5.63).
- South Hampshire has above the Regional average unconstrained land resources on the fringe of existing urban areas - only water issues provide a constraint and even then an addition could be accommodated (summary paragraphs 45 & 56, main paragraph 4.97)
- South Hampshire has one of the greatest potentials for growth (summary paragraph 57)

The Tym Report, and previous SEERA monitoring reports, highlight the constraints applicable to much of the South East, including the extent of green belt / AONB, influence of Natura 2000 sites and extent of travel by private car. Relatively, South Hampshire is unconstrained and self-contained. Thus whilst R Tym's Option D may be inappropriate for many of the sub-regions, and result in overall overprovision, a South-Hampshire distribution of 6,572dpa (total 131,440) is relevant and would support the sub-region's economic objectives.

In principle, an increase would recognise the opportunities identified in the Sub-Regional Study (para 9.4) including the fact that, South Hampshire is the largest urban area in the South East outside London, the cities of Southampton and Portsmouth offer major employment opportunities and yet the sub-region contains the largest PAER with significant levels of deprivation. The Study, acknowledges the attractiveness of maximising growth (para 8.15), and considers that 102,000 dwellings (5,100 dpa) would be in line with the Barker Report recommendations to reduce real house price inflation to 1.8% (para 5.4). The PUSH Final Report, November 2004, states that on the basis of 30% affordable housing, 95,000 additional dwellings would be required to meet needs to 2026 (para 2.18).

In terms of capacity, increasing growth would lead to an increase in the greenfield requirement. The sub-regional study identified a current supply of around 45,000 dwellings including, existing commitments/expectations (20,000 dwellings), urban capacity (15,500 dwellings), reserve allocations (4,500 dwellings) and urban intensification (5,000 dwellings) (paras 5.6 & Table 1). PUSH has revised this figure to 47,000 - 56,000 dwellings (South Hampshire Strategy November 2004). Assuming maximum urban capacity, the greenfield need is 46,000 - 75,440 dwellings, requiring 1,840 - 3,000 hectares (gross density 25%, as per Tym Report). In addition 500 - 700 hectares are required for employment (PUSH Final Report relating to 3.5% GVA)

In conclusion, increasing housing provision in South Hampshire would assist in focussing development where employment opportunities can be maximised, deprivation redressed and opportunities to encourage travel by modes other than the private car further encouraged. This level of growth is possible through a combination of urban extensions, major urban extensions and SDAs, providing the bulk of development in locations that are well related to the cities, smaller sites dispersed through the sub-region and maximising locations close to regional employment opportunities and transport routes. We know of sustainable deliverable sites with capacity for 30,000 dwellings. These are illustrated at appendix 1, which also demonstrates capacity for others.

## **2. Is the level of affordable housing justified and capable of being implemented.**

Many development sites, particularly urban sites, fall below policy thresholds and will not provide affordable housing. Furthermore, 64% of dwellings built in South Hampshire 2001 - 2005 were one and two bedroom flats, with percentages highest in the two cities (see appendix 2). A continuation of this trend means that the full range of needs will not be met. Increased levels of house building on sustainable greenfield sites will facilitate appropriate provision being made. Without major greenfield allocations the target would be unrealistic.

## **3. Are the proposals for the SDAs justified and appropriate? How will they contribute to meeting the need for socio-economic regeneration of parts of the sub-region, particularly urban centres? In the absence of detailed assessment, is the specificity about the SDA locations appropriate? Is the approach to phasing set out in paragraph 2.6 realistic and achievable?**

### *Justification*

The total additional greenfield land requirement will be at least 2,340 hectares. Government guidance identifies a number of key sustainability criteria which should be considered in defining a housing distribution strategy, including:

- i. Accessibility (existing and potential) to jobs, shops and services by modes other than the car;
- ii. The capacity of existing infrastructure, and the cost/potential of adding further infrastructure;
- iii. The ability to build communities to support new infrastructure and provide sufficient demand to sustain local services and facilities; and
- iv. Physical and environmental constraints.

Some well-located smaller urban extensions will meet these criteria, however a strategy based solely on small sites limits the potential to meet the objectives, particularly ii and iii. The following issues lead to a more concentrated approach:

- The urban areas will accommodate 56,000 additional dwellings, placing pressure on transport, services and facilities.
- Not all existing infrastructure will have the capacity to expand to accommodate further development.
- Small sites do not have the financial capacity or land availability to support significant levels of new services and facilities.
- The cumulative effect of many smaller urban extensions is likely to be similar to, if not greater than, the effect of a larger urban extension without the resources for mitigation.
- The number of smaller urban extensions required would undermine any opportunity to affect a spatial distribution linking to the two major cities and other employment nodes.

Larger urban extensions are more likely to offer sufficient land and critical mass to provide new schools, community services, public transport etc. Furthermore, where they connect to the urban areas existing communities can benefit. In combination with smaller and larger urban extensions, the approach is more likely to deliver all of the objectives for the sub region. We fully support the PUSH evidence and conclusions in this respect, as outlined in its rationale paper.

We therefore conclude that the SDAs are both justified and appropriate on grounds of land requirements and sustainability.

#### *Regeneration*

The existing urban area contains within it significant employment opportunities and, in places, significant deprivation but has limited capacity to accommodate more development. The next best solution to building directly alongside relevant areas must be to concentrate development into larger urban extensions. The scale of the proposed SDAs will not compete with the city centres but will support a good range of housing types and local community facilities. The proposed locations are justified because they can link to the city centres/employment/retail nodes, providing support for retail and add new services, facilities and affordable housing, that can be accessed by existing communities.

#### *Location*

There has already been extensive public consultation regarding the location of a Hedge End SDA. PUSH has considered the alternatives and we would broadly agree with its conclusions, subject to matters addressed in our appendices. The identification of this location has affected the housing distribution to districts, infrastructure planning (including provisions for public transport) and the results of the sustainability assessment. Given the work that has already taken place, a policy that is location specific enables the relevant authorities to focus on the next stages of planning for the SDA, going straight to the preparation of an Action Area Plan, and provides developers/landowners with certainty to focus on delivery. It should be noted that in respect of North Hedge End a consortium of developer interest is already in place controlling much of the land required. This progress is essential if the SDAs are to help meet the sub-regional strategy and deliver housing on time, as discussed under phasing below. Indeed, there is a good case for the location to become even more specific, as follows.

PUSH and ourselves broadly agree with the outer limits of the North Hedge End SDA, influenced by landscape issues (see appendix 3). However, it is documented that PUSH is promoting an SDA location that safeguards a gap between Hedge End and the SDA. This would draw the SDA away from the rail station, segregate the new community from the existing, unduly constrain the master planning process and, unless actively used as suds, formal open space and for community infrastructure, would provide insufficient land for the built development. This is not a positive planning approach.

The SDA should be connected to the existing urban area, drawing it as close as possible to Southampton City and to the extensive retail and employment opportunities offered within Hedge End. Any new schools or community services should be located to enable use by the existing community, rather than located beyond and 'open gap' where security issues would undoubtedly lead to access by car rather than foot or bicycle. The SDA should be clearly centred around the station, to encourage maximum use of rail. The strategy diagram at appendix 4 demonstrates how much of the SDA can be developed within 800m of the station.

The RSS must provide clarity, to ensure that the AAP master planning process provides an appropriate land configuration, led by planning principles rather than unjustified aspirations to keep the SDA and existing community separate. This should be dealt with in policy and on the key diagram. Further evidence is provided at appendix 4.

#### *Phasing*

The SDAs are fundamental to the strategy. The planning, masterplanning and environmental assessment process will take time, they will have long lead in times and will take years to build. 10 years is not a sufficient build period to complete 6,000 dwellings in one location. Further programming information is at appendix 5.

This shows that the North Hedge End SDA, if commenced in 2011, can complete 6,000 dwellings by 2026, the Fareham SDA about 7,200 dwellings. Both need to commence as soon as possible. The shortfall resulting from the Fareham SDA (2,800 dwellings) needs to be redistributed elsewhere.

#### **4. In all other respects, is the proposed apportionment of the overall housing provision figures to the Districts at the most appropriate level, taking account of the balance between brownfield/greenfield, and other socio-economic and environmental factors?**

Paragraph 9 of PPS11 requires the RSS to identify major urban extensions as necessary and appropriate. Consequently the RSS should identify locational opportunities for larger urban extensions (more than 1,500 dwellings) together with the extent of capacity for smaller urban extensions. District distribution should be adjusted accordingly. Unless the RSS identifies these opportunities it will be difficult to test the distribution.

The South Hampshire strategy relies heavily on implementing larger urban extensions 2011 - 2016. In reality unless they are identified, at least as potential areas for further investigation through the LDF process, then many will be delayed to the extent that much of their delivery will be post 2016, see appendix 6.

The PUSH consultation paper 'Where Shall We Live' (2005) states that larger urban extensions have not been considered in Eastleigh or Fareham because of the SDAs. This is not a justifiable planning reason to preclude full consideration of all of the sustainable urban extension opportunities. We know the following opportunities exist, and are deliverable:

- North Whiteley, Winchester District (4,000 dwellings)
- Stubbington, Fareham District (2,000 dwellings)
- Hamble Airfield, Eastleigh District (1,750 dwellings)

Further general information on the capacity of these, and therefore the relevant districts, is provided at appendices 7, 8 and 9.

To address the delay in delivering the entire Fareham SDA pre 2026 and yet maintain a focus on Portsmouth, there are opportunities to consider interim smaller urban extensions. These are highlighted on the plan at appendix 1 and support the overall distribution to Fareham up to 2026 with greater flexibility to deliver.

**5. How should the relationship between employment growth and release of housing land be managed?**

**6. Is the policy for Strategic Gaps properly justified?**

The desire to maintain the separate identity of settlements along the coastal strip, to avoid the coalescence of Southampton, Fareham, and Portsmouth, has been material to the housing distribution strategy. However, the relative importance given to these designations should be weighted more appropriately, given the overriding need to provide a step change in housing delivery and to identify sustainable locations. The PUSH paper provides gives too much weight to safeguarding existing 'gap' areas. Including gap policy in the RSS gives inappropriate merit to this position.