

South East Plan EiP: Sub matter 2A.5 and 2A.6 (Revised)

Statement by Partnership for Urban South Hampshire (ref 7138)

2A.5 Does Policy H1 plan for an appropriate and deliverable level of housing growth for each sub- region and 'Rest of County' area,taking account of best available information and all relevant factors, including:

- **the draft plan's vision and public opinion;**
 - **demographic, housing need and backlog, and affordability;**
 - **economic potential and regeneration;**
 - **local capacity for growth, including infrastructure and government policy initiatives;**
 - **environment?**
1. The Partnership for Urban South Hampshire (PUSH) considers that Policy H1 does plan for an appropriate and deliverable level of housing for South Hampshire. The figure set out in the Policy should be seen as the maximum, taking account of the best information available and all relevant factors.
 2. The level of housing proposed is that which is required to support the economic growth strategy and accords with the draft plans' vision to secure urban regeneration based on defined hubs. The Panel will also be aware that the figure for South Hampshire (about 20% above current RPG) represents the kind of step change sought by Government, whilst the figure proposed in the Plan for the South East as a whole is largely unchanged.
 3. Public opinion polling showed (Core Document SH2, paragraphs 5.11 – 5.13) that the residents of South Hampshire overwhelmingly backed giving more emphasis to economic growth. This is the main rationale for the scale of housing development proposed in the Draft South East Plan. Additional housing is not needed to secure improvement in the performance of the local economy and would not be supported by PUSH. It is also likely to be opposed by local residents.
 4. The strategy for South Hampshire seeks to realise its economic potential and secure regeneration of the older urban areas. The level of housing proposed is justified on this basis.
 5. A Housing Market Assessment has been carried out to inform the level of housing required. The figure for South Hampshire in the draft South East Plan meets locally arising need (including backlog) and allows for some immigration. Whilst housing affordability is an issue for South Hampshire, house prices are generally lower than other parts of the region. The policy for South Hampshire is to provide a considerable amount of new housing as either affordable rented or intermediate which should go some way to enable households to afford homes in the area.

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6. The Panel debate on South Hampshire highlighted issues and uncertainties over infrastructure provision. There are no guarantees that the designation of the area as a New Growth Point and its identification as a 'Diamond' in the Regional Economic Strategy will secure the levels of investment that are necessary to underpin the growth strategy. PUSH will continue to press regional and national bodies to align their funding streams in support of the strategy for the sub-region.
7. The Panel will also be aware of the considerable uncertainty raised by the statutory and non-statutory bodies regarding the environmental impacts of the proposed strategy for South Hampshire. PUSH recognises their concerns and is working to identify options for addressing them.

2A.6 Hypothetically, what would be the implications of higher regional housing levels on:

- **water supply and waste water treatment, and flood risk;**
- **transport and other infrastructure;**
- **affordable housing;**
- **landscape, heritage and biodiversity assets;**

and to what extent could these be addressed?

8. A higher rate of housing than that currently proposed for South Hampshire would de-couple the link between the strategy for economic growth and the level of housing required to support that growth. Additional housing is unlikely to be matched by a commensurate increase in jobs. The likely outcome would be a combination of in-migrants competing with local residents for scarce jobs and an increase in out-commuting as workers have to look beyond South Hampshire for employment. The former would undermine the regeneration aim of the current strategy whilst the latter would lead to an increase in unsustainable travel patterns and more pressure on the already stressed strategic transport network. There are also environmental and infrastructure reasons for not supporting additional housing above that already proposed, as explained below.
9. The Panel will be aware that South Hampshire has already raised its housing figure to 20% above current RPG. The level of housing proposed in the draft Plan is already causing concern over the implications for water supply, waste water treatment and flood risk. All three areas are the subject of further work that is being commissioned by PUSH, in part to address the concerns being raised by the Environment Agency and Natural England, amongst others.
10. The Partnership believes that, subject to successful implementation of water efficiency measures and new resource provision, there will be sufficient water supplies to serve the sub-region. However, uncertainties over future abstraction levels and the wider implications for European nature conservation sites remain unresolved. Higher rates of housing can only increase these uncertainties and cannot be justified without further research and evidence

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that the 'dual approach' to water resource management, as advocated by the Environment Agency actually creates sufficient 'headroom' to accommodate more homes without damaging the environment. These issues were recognised in the partnership conditions set by Government when selecting PUSH as a new Growth Point last October.

11. The Panel already knows that the Appropriate Assessment for the Plan has raised considerable doubt over existing effluent discharges into the Solent. Finding a solution that satisfactorily deals with the current and planned level of development is a major challenge. It was argued by one of the EiP participants that if the sewerage infrastructure requires substantial new investment, this could be part funded through additional development over and above that already proposed. Apart from the perversity of seeking to solve a development constraint by contemplating even more development, higher rates of housebuilding would create new problems of a different nature. PUSH believes that it would not be realistic to consider higher rates of house building until the full implications of the existing levels of planned development are known.
12. The Panel will be aware of the concerns of the Environment Agency on flood risk issues related to the current distribution proposed in the draft South East Plan. These concerns are currently being tested through the Strategic Flood Risk Assessment for the sub-region (the results of which will be known later this year). If the Panel is minded to embrace the EA's view that no development should be allowed in areas at risk of flooding, then there should be a full review of the South East Plan's housing distribution, including reconsideration of the current housing figure for South Hampshire, and not simply a re-distribution of housing to other Districts within the sub-region. In this context, it will be irresponsible to consider increasing the sub-regional housing requirement without resolution of outstanding issues on flood risk in advance.
13. Increasing the housing figure for South Hampshire will require additional greenfield releases which would undermine the regeneration approach for the sub-region and mean that the Government's 60% brownfield development target would not be met.
14. The Panel will also be aware of the concerns that PUSH has regarding the prospect of securing sufficient investment in infrastructure, especially transport, to meet the current level of planned growth. Although additional housing will make a contribution to fund new infrastructure PUSH believes that this will be insufficient to bridge the gap.
15. On affordable housing, the sub-regional strategy already seeks to address anticipated needs and the backlog. If further affordable housing is required this should be through direct funding and not on the back of additional market housing (which will lead to a growing mismatch between the economic strategy and labour supply).

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16. The EiP debate on the South Hampshire sub-regional policies also heard concerns expressed over the implications of the growth strategy on landscape, heritage and biodiversity assets. PUSH believes that the South East Plan, as proposed to be amended by SEERA in response to the recommendations of the Appropriate Assessment, respects the neighbouring New Forest National Park, South Downs AONB, biodiversity and environmental quality generally. A higher rate of house building would threaten this position and compromise other assets – such as the separation between settlements, which is also highly valued.
17. The Roger Tym study (Augmenting the Evidence Base for the South East Plan) was a purely desk exercise that did not take account of the nature and complexity of the constraints within South Hampshire. Its conclusion that there is significant capacity within the sub-region to accommodate more housing does not reflect the very real constraints and uncertainties present here.
18. If the Panel were to conclude that the region-wide total for housebuilding should be increased, none of that increase should be allocated to South Hampshire. PUSH believes that the figure in the South East Plan for South Hampshire has been set at the right level. The Partnership has crafted a well thought out strategy that has sought to align economic and housing growth in a pressurised sub-region facing significant environmental challenges. A higher housebuilding rate would unbalance this strategy and could not be accommodated without detriment to the environment. The sub-region is already proposed to accommodate a 20% increase on current RPG housebuilding rates.
19. If the Panel is minded to recommend a higher housing figure for South Hampshire it would need to be supported by a clear justification in terms of impacts on the economy, transport and other infrastructure and the environment.