

STRATEGY/VISION/SUSTAINABILITY – POLICY DS1  
Comments by John Hayter, resident of Bishops Waltham

9<sup>th</sup> October 2012

## ISSUE 1

DS1 (p37)

### Issue i) JCS spatial vision, justified by NPPF, robust alternative, if not what?

The spatial vision does not state the period over which the housing numbers have to be met. Insert *“for the period April 2011 to March 2031”* as in CP1.

No provision for PUSH requirements 2026 to 2031 that at current going rates would require allocation of at least a further 2000. Alternatively assumption without supporting evidence that PUSH will no longer be a source of housing requirements by then.

Spatial Areas.

Market Towns (MT) and Rural Areas (RA) should be split into 3 parts.

Policy approach for MT is self sustaining community and hub within District hierarchy.

RA policy is local housing need only.

Evidence base is different for each.

RA makes no differentiation between those sustainably linked to MT hub and remote locations where growth is inherently unsustainable.

MT spatial definition should EITHER be MT only + sustainably linked to the MT hub + truly RA

OR MT and sustainably linked to MT hub + truly RA

Reasons – Ensure NPPF 15 (clear local policies for sustainable development presumption)

Recognise clusters of smaller settlements as in NPPF 55

Evidence base is different for each of the 3 areas and seemingly non existent for the hub linked communities.

Division of total housing between the 3 spatial areas not consistent with NPPF 17 *“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. No advantage is taken of the sustainable transport infrastructure already available in the M3 and M27 corridors, nor the exceptional sustainability of Winchester as the only community with both a bus and railway station and intra settlement bus service when other communities have none, nor account taken (NPPF37) of the need to minimise journey lengths between settlements and public transport provision to the nearest main employment, higher education, service and shopping centres of Winchester, Eastleigh, Southampton, Fareham, Havant and Portsmouth.*

Housing delivery under DS1 cannot be directly monitored. PUSH component includes, in addition to Waterlooville and Whitely, Bishops Waltham, Wickham, Denmead and intervening villages so that on-going conformance to PUSH housing policy 11 numbers can only be monitored and reasons for any disparity established at the all-settlements level.

Add to opening paragraph *“Of the 11,000 total 6,700 are to be provided within the S. Hants PUSH area of the District.”*

Corresponding changes to JCS S8 Monitoring are also required.

### **Issue ii) SA, SEA, AA assessment?**

SA objective 3:

SA MTRA (p32) options 2 & 3 concern the consolidation or step change in the “key hub” role. Similarly (p33) for “local hubs”. These were segmentations in the 2009 emerging core strategy that were discarded as a result of the public consultation. Similarly (p34) the strategy does not now include housing allocations by a “settlement hierarchy” There is thus now no relevant MTRA SA.

There is no SA for the PUSH component of the JCS.

There are thus also no relevant defined sustainability parameters for on-going MTRA and PUSH sustainability monitoring.

The SA relating to MTRA and PUSH should be updated to reflect as proposed to be amended policy DS1.

There is no PUSH HMR trajectory or SHLAA supporting the PUSH requirements.

### **Issue iii) Deliverability?**

The subject of DS1 is “support for the delivery” of the strategy but makes no mention of flexibility and of the need for rapid response to changed circumstances.

Add new bullet:

*“At all times the policy emphasis is to provide rapid solutions to housing need. Where unforeseen local or national circumstances occur that are not reflected in the latest SHLAA developers are encouraged to approach the council with proposals that may deviate from this policy but justified by providing rapid solutions to those particular circumstances.”*

Add to supporting text.

*“Significant unforeseen local or national circumstances are those which change housing market signals such as land and house prices and market and social housing affordability across the District or more locally or some natural or other disaster.”*

The current PUSH numbers deriving from the former SE Plan are 6740 for 2006 – 26, 337pa. Oct 2012 PUSH policy 11 revision changed the PUSH Plan total to 6,200 but only for remaining 15 years to 2026, 413pa and thus 23% increase on the current DS1 going rate. [South Hampshire Strategy Background Paper: Employment floorspace and housebuilding provision figures 2.9] **Most of the additional numbers are to catch up for the lack of demand, and hence shortage of about 2000 completions in the last 5 years over the whole of the PUSH area [Background paper at 1.7 to 1.9]. The difference of 78pa over the JCS’ 20 years requires an extra allocation of about 1,500**

NPPF 47 only requires the new Plan to have a future supply of 5 to 10 (15 where possible) years and there is no NPPF requirement to catch up any backlog from the now superseded PUSH Plan. The additional PUSH requirement should have been justified by an HMR trajectory and SHLAA and any significant deviations from the trajectory corrected by trajectory changes, not major new allocations; also, given that the PUSH requirements for years 11 to 15 will also require new strategic allocations, the 10 year period is insufficient.

In any event it is not realistically possible to provide this 23% degree of flexibility to accommodate a changing economic climate. This risk is recognised in the Sept 2012 PUSH SA [E3.2, E3.3] but not in WCC's strategy or its SA.

The JCS PUSH component is not soundly based because it derives from PUSH numbers and evidence inconsistent with NPPF, fails to recognise this huge outside dependency and lacks the flexibility to accommodate it. The PUSH relationship should be changed so that proposals are subject to public consultation and independent testing of soundness.

#### **Issue iv) Inconsistency with national guidance**

NPPF 15 clear local policies for sustainable development presumption

NPPF 17 (and similarly NPPF 33, 35 and 37) *take account of market signals, such as land prices and housing affordability And actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*

NPPF 21 flexibility for rapid response to rapid economic or event driven changes.

NPPF37 Locate to minimise journey lengths for employment, shopping, leisure, education and other activities

NPPF47 PUSH Plan with 10 to 15 years future supply and no former Plan backlog catch up requirement.

NPPF 55 Recognise clusters of smaller settlements

NPPF 159. No *Strategic Housing Market Assessment* consistent with the overall housing numbers. No HMR trajectory or SHLAA supporting the PUSH requirements (also NPPF48)

No justification has been provided for these inconsistencies with national guidance.

#### **Issue v) Evidence how and why preferred strategy selected**

I have found no Strategic Housing Market Assessment in the submitted evidence base nor one supporting the policy's housing numbers.

Total of 11,000 and PUSH component derive from former Regional Plan. The 11,000 was a given and thus not subject to public consultations and, due to its age, takes no account of NPPF 17 requirement to *take account of market signals, such as land prices and housing affordability* that have significantly changed in the meantime.

PUSH total of 6,700 (5,500 SDA's, 1,200 S. Hants MTRA) is not explicit in the JCS, was also a given in the public consultation and thus not been subject to public consultation. PUSH is not a planning authority and it is not a statutory plan with defined boundaries, its policies are not subject to formal review of evidence based soundness and conformity. The PUSH

**housing (and employment space) Strategic Housing Market Assessment and economic and demographic forecasts by Oxford Economics are not supported by a HMR and SHLAA and inconsistent with those underlying the rest of DS1 that have not changed since about 2009.**

**No justification has been provided for using out-of-date data or the lack of public consultation.**

**In any event the Oct 2012 PUSH policy 11 revision increased the “aspirational” total to 6,200 but only for remaining 15 years to 2026, pro rata 8267 to 2031 and thus 23% increase on the current DS1 5,500 in SDA’s and 1200 in the MTRA part of the PUSH area. Again there has been no public consultation and none is planned despite the “aspirational” and “subject-to-later-revision nature of the proposals”. [PUSH Employment & Housing background paper 2.10].**