

**HOUSING POLICIES CP1, WT1 & SH1**  
**Comments by John Hayter, resident of Bishops Waltham**

9<sup>th</sup> October 2012

## **ISSUE 3**

### **Issue i) Number & locations consistent & deliverable?**

The numbers and locations are all consistent with DS1 and SHLAA. However my comments on DS1 identified that these numbers had not been subject to SA, are based on out-of-date data from the former Regional Strategy, overall numbers not supported by an up-to-date Strategic Housing Market Assessment (SHMA) nor any HMR or SHLA for the PUSH component, lack the flexibility to rapidly respond to unforeseen circumstances and events and do not meet the NPPF 17 requirement to focus development in locations well provided with sustainable transport or NPPF37 to reduce journey lengths.

#### **CP1 p84**

The PUSH October 2012 housing policy proposes a 23% increase from 6,700 to 8267. CP1 is not consistent with this, or the SHMA, SA, HMR or SHLAA.

#### **WT1 p48**

The numbers and locations are consistent with DS1 and SHLAA. However the 2000 within or adjoining the settlement are overly dependent on essentially windfall change of use sites and no strategic definition of where the settlement adjoining sites would or could not be. This contributes to a lack of flexibility to respond to unforeseen circumstances and events compounded by the economic risks and to early completion rates at Barton Farm.

#### **SH1 p61**

There is nothing within this policy to ensure provision of a sustainable transport infrastructure via the A27 bus routes and nearby railway stations. This could then double as a park and ride location to particularly Portsmouth and Southampton via M27 journeys.

### **Issue ii) Deliverable in accordance with NPPF?**

The policies do not set out their approach to housing density as required by NPPF 47.

No policy as in MTRA1 and as required by NPPF50 relating to provision for older, reduced mobility and persons with support needs. Inserting here would cover all spatial areas and permit removal from MTRA1.

**SH1** Due to the PUSH housing uncertainty an additional buffer may be required.

These are all large new developments with consequent start-up risks of delay. There is inherently little flexibility to cover for this within this policy group.

### **Issue iii) Delivery management adequate?**

The absence of a current overall Strategic Housing Market Assessment and no HMR and SHLAA for the PUSH component means there is no means of establishing whether DS1 and

its dependent housing policies are adequate to meet demand or becoming unsustainable or not viable through over provision.

#### **Issue iv) Contingencies / alternatives adequate?**

The inherent and particularly economic risks from reliance on new communities of 2,500 at W. Waterlooville, 3000 at Whitely and 2000 at Barton Farm (7,500 out of 11,000 total) combined with the uncertainties of in-fill and change of use for much of the rest have to be weighed against the benefits of the provision of affordable and market energy efficient homes in sustainable locations with commensurate open space and other infrastructure. Conversely there are no housing density criteria for these new communities (NPPF47) that may provide significant upward flexibility. A gross density of perhaps 30 dwellings/Ha is suggested that would then probably require net densities of up to 50/Ha consistent with the high sustainability of the locations and dwellings.

Oct 2012 PUSH policy 11 revision increased the currently required going rate from 337 to 413pa and thus by 23% on the current DS1 rate and a total of about 1,500 over the JCS' 20 year period. Most of this increase is because of lack of PUSH overall demand in the last 5 years. This scale of change can only be accommodated by complete revision of policy DS1 and its dependent policies to increase the new communities' proportion to 9,000 in 12,500 (72%). Within this only 3000 (28%) have planning permission. The implementation risk inherent in this makes the new PUSH policy, that is described as "aspirational" and "to be tested during the preparation of Local Plans", "unreasonable" in NPPF 182 terms. [PUSH Oct 2012 Employment & Housing background paper 2.10] It is not clear how, in the absence of a PUSH HMR, SHLAA and 15yr plans and monitoring by each LA of their housing trajectories against the PUSH plans, "testing" could be properly done.

It is unlikely that sufficient flexibility to respond to change can be provided except by allocation of 2 reserve sites of perhaps 100 each in both the PUSH and non-PUSH parts of the District. This is similar to the successful WDLPR reserve site policy.