

South East Plan EiP: Sub Matter 2A Spatial distribution

Statement by Partnership for Urban South Hampshire (ref 7138)

2A.1 Is the spatial strategy clear and soundly based? Have a sufficiently wide range of spatial options for accommodating new development (settlement form and location) been tested?

1. The Partnership for Urban South Hampshire has no comment to make on this question at this stage.

2A.2 Is the draft RSS focus on concentrating new development in urban areas appropriate? Is the draft RSS target of 60% of new housing on previously developed land sufficiently challenging (Policy CC8a)?

2. The Partnership for Urban South Hampshire fully supports the draft RSS focus on concentrating new development in urban areas. This is also the thrust of the South Hampshire Sub-regional Strategy drawn up by PUSH and now incorporated in the South East Plan, which focuses growth on the urban areas in order to regenerate Portsmouth, Southampton and the sub-region's towns.
3. The target of 60% is sufficiently challenging because the housing targets will necessitate a substantial amount of development on greenfield sites. The target represents an average across the region and over the plan period, within which there will be some variation. For example a lower proportion may be achieved in South Hampshire when the Strategic Development Areas come on stream from 2016. Over the Plan period as a whole, the South Hampshire sub-regional strategy anticipates that just over 60% of new housing will take place on previously developed land (PDL), in line with the national target and Policy CC8a of the Plan.
4. Of course, there is nothing magical about the 60% target of housebuilding on PDL; it is simply a figure which the Government decided was an appropriate national target. The percentage actually achieved is primarily a function of total provision and this can be affected by the price differential between housing and other land uses and the availability of alternative greenfield land. The following points, although specific to South Hampshire, are probably applicable to most other parts of the region as well.
5. There are already issues about the type of properties being built on PDL. In Southampton, for instance, over 80% of recent dwellings have been one and two bedroom flats, with a corresponding fall in family accommodation. This cannot be sustainable in the long term if our cities are to meet the

housing needs of all sections of the community. If the Panel is minded to raise the PDL target it would inevitably make this position worse as planning authorities and developers seek to build as many units as possible on each site.

6. Much of the PDL redeveloped for housing in the two cities in South Hampshire in recent years was formerly in employment use. Over the five year period to 2002, the employment land lost to residential use was equivalent to nearly a third of the total new industrial and office development over the same period. Residential land values can exceed employment land values by a factor of 3 to 1, so it is easy to understand why landowners seek to redevelop such sites for housing. Such employment sites tend to be small and occupied by start-up or low tech businesses with small profit margins. They help diversify job opportunities and, by virtue of their location within urban areas, are highly accessible to the local labour market. The consequent need to replace employment land is not sustainable in the long term as it will be displaced to peripheral greenfield locations, reducing local job opportunities and forcing employees to commute further to locations that are harder to serve by public transport. Any increase in the PDL target from its current 60% would be likely to increase the differential value between housing and other uses, including employment. The Partnership would not support this as it will undermine efforts to regenerate the older urban areas.
7. The Partnership believes that the PDL estimates for South Hampshire are robust and, for the two cities, particularly challenging¹. In this regard it is worth noting that developers over the past five years (in response annual monitoring of housing land supply in Hampshire²) have consistently argued that the estimates of urban capacity were too high. Each year they have been proved wrong – actual provision on brownfield sites has broadly been in line with the forecast produced by Hampshire planning authorities. That is not to say that everyone supports the focus on PDL - public consultation undertaken on options for housing distribution undertaken last year³ showed that residents, amenity, environment and social groups thought that the level of development proposed for the urban areas in South Hampshire in the draft South East Plan was too high.
8. Two thirds of PDL housing in South Hampshire is expected to be built in Southampton and Portsmouth. The estimates assume that further housing will be permitted within the currently defended floodplain (this is a particular issue for Portsmouth which will be debated further in the South Hampshire session). If the Panel is minded to place significant weighting

¹ Annex A of PUSH Final Advice to SEERA Background Report: Housing, December 2005 provides further information on the methodology used.

² Undertaken to inform the release of strategic greenfield reserve housing sites

³ See PUSH Final Advice to SEERA Background Report: Housing, December 2005 pages 17-22.

on minimising flood risk the percentage on PDL in South Hampshire will fall below 60%.

9. Finally, the Panel will recognise that if the overall housing target for South Hampshire is raised the inevitable consequence will be that the additional housing will be built on greenfield sites with the effect of reducing the percentage built on PDL.
10. The Partnership asks that the Panel consider very carefully all the implications of changing the target set out in the draft South East Plan. Raising the target may provide more housing in urban areas but it could be of the wrong type and at the expense of other less profitable land uses which will be displaced elsewhere. The net effect will be a pattern of development that is not sustainable and cities and towns that do not perform in the way anticipated in the Plan.

2A.3 How do the spatial strategy elements, particularly the regional Hubs, relate to the Diamonds in the draft RES, and to potential Growth Points? Is there a need for a hierarchy within the Hubs?

11. The Partnership for Urban South Hampshire supports the sub-regional strategy for South Hampshire which is based on sustainable economic growth. It contains two regional Hubs, is identified as a Diamond in the RES and has recently been identified by the Government as a New Growth Point. The spatial strategy for the sub-region is accordingly fully aligned with these designations, all of which PUSH supports. PUSH recognises that this may not be the case with other parts of the South East.
12. The Partnership would support the notion of a hierarchy within the hubs provided priority (in terms of implementation and investment) is given to those that are both Diamonds and New Growth Points in recognition of their importance and commitment to deliver higher levels of economic and housing growth (NGPs will deliver RPG plus 20%).

2A.4 Are the sub-regions identified appropriate and necessary? Does the draft RSS pay sufficient attention to the inter-relationships between sub-regions and the functional relationships between the sub-regions and other parts of the region and beyond? Is there sufficient recognition of the roles of districts outside the sub-regions?

13. The Partnership strongly supports South Hampshire being regarded as a sub-region which it believes is both appropriate and necessary
14. There is a long tradition of joint strategic planning in South Hampshire which goes back to the 1968 South Hampshire Structure Plan. For almost

40 years the area has been recognised (in regional and county plans) as having complex functional inter-relationships which cross administrative boundaries that require a strategic, sub-regional response. A sub-regional policy framework in the draft South East Plan is essential to address these cross-boundary issues.

15. To help inform the draft South East Plan, links between urban South Hampshire and the neighbouring sub-regions of Sussex coast and Eastern Dorset (in South West region) were explored in the Eastern Dorset, South Hampshire and Isle of Wight Sub-regional Study⁴. This largely confirmed previous conclusions that South Hampshire is largely focused on the cities of Southampton and Portsmouth and their immediate hinterlands. There are links with places further afield but these are, in most cases, not particularly strong or are restricted to a specific issue.
16. Although South Hampshire clearly has relationships with a much wider area the advice from PUSH to the Assembly was that the boundary for the sub-region in the South East Plan should be tightly drawn to reflect the growth potential that would assist in regenerating the two cities and other older urban areas.
17. For this reason, the sub-region excludes both the New Forest National Park and the proposed South Downs National Park. The sub-region includes the southern parts of Winchester District - notably parts of Whiteley, but excludes the city of Winchester. That city has stronger links with its huge hinterland to the west, north and east, than it does with South Hampshire. It is worth noting that in planning terms Winchester has never been considered to be part of South Hampshire. Those who argue for the boundary of the sub-region to be extended to include the city of Winchester and/or other areas to the north of the current boundary, often do so because they believe this will improve the prospects of additional substantial development in those areas. PUSH would strongly resist substantial additional development in those areas because it would undermine the economic growth and regeneration of South Hampshire, focused on the two cities.
18. PUSH believes the boundary for South Hampshire set out in the draft South East Plan is 'fit for purpose' – that purpose being to coordinate the planning and delivery of sustainable economic growth and urban regeneration in an area of complex functional and administrative arrangements. The Partnership strongly recommends that the Panel

⁴ Eastern Dorset, South Hampshire and Isle of Wight Sub-regional Study, May 2004 – can be viewed at www.push.gov.uk

should not alter the sub-regional geography of the Plan as it relates to South Hampshire.

19. PUSH has no view on the appropriateness of, and need for, other sub-regions.

2A.5 Hypothetically, if a case were made for higher regional housing levels, what would be the most appropriate approach to distribute the additional dwellings arising from these, taking account of economic, environmental and social implications?

20. The Partnership has no view on what is the right level of housing for the South East Plan, nor does it have a view on the most appropriate approach to distribute the additional dwellings across the region as a whole.
21. In this debate PUSH asks that the Panel recognise that, whilst the overall level of housebuilding in the draft South East Plan is only slightly more than currently set in RPG9, the corresponding figure for South Hampshire is current RPG plus around 20%. This will require a step change in delivery and will involve long lead-in times for the necessary infrastructure to achieve such an increase.
22. In deriving this figure, PUSH has sought to align economic growth, jobs and housing, as well as addressing locally arising housing need and the current backlog in housing provision. It would be very concerned if the Panel ignored this body of work when considering the possible distribution of additional housing.
23. The consequences of imposing a higher housebuilding target will be to decouple the link between managed economic growth and housing supply. Many parties have already indicated that they believe that the economic growth target for South Hampshire is an aspiration that cannot be met. Sub-matter 8Bi will look at this in more detail. The potential consequences of increasing the South East Plan's housebuilding target for South Hampshire include higher levels of unemployment (as there would be too few jobs available in South Hampshire) and/or an increase in out-commuting as workers travel further afield for employment. Neither of these are attractive, sustainable outcomes.
24. Other EiP sessions on South Hampshire will consider the environmental implications of the policies in the draft South East Plan. PUSH is not confident that a higher housebuilding target can be achieved without impacting on water resources and asks that the Panel note that some parties have already questioned the ability of the sub-region to absorb the target set out in the draft Plan.

25. The Panel will be aware that the recent Roger Tym report 'Augmenting the evidence base'⁵ reached the conclusion that South Hampshire has a significant amount of 'unconstrained' land and is one of four sub-regions which offer the most potential for additional growth. This is not a view recognised by the Partnership which considers the Tym report to be an extremely superficial piece of research and not a credible basis for deciding the future provision for housebuilding.
26. 'Unconstrained land' identified in the Roger Tym study in South Hampshire includes recreational open spaces and features such as Portsdown Hill – the highest point in the sub-region, a notable landscape feature and valued recreation area. The consultants inability to identify and recognise such assets is a major flaw and weakness in this desk based study. There are also some errors in the calculations pertaining to the assessment of unconstrained land in South Hampshire. For instance, Figure 4.10 of the report suggests that the more than 100% of unconstrained greenfield land is available and can be built on in places such as Portsmouth and Southampton under one or more of the options tested. Clearly, it is not possible to build on more land than is available other than by building out to sea!
27. All the options in the Tym study take the draft South East Plan housing figures as a given and distribute additional housing using various approaches to top up those figures. However, as has already been stated, unlike many other parts of the region, South Hampshire has already embraced housing growth and PUSH does not consider it to be a credible planning approach to use the draft South East Plan figures as the starting point for determining where to put additional housing across the board.
28. PUSH asks the Panel to recognise that current strategy for South Hampshire is aligned with the requirements arising from economic growth, will provide housing for local needs and is deliverable within the environmental capacity of the sub-region. The Partnership believes that a higher housing target for the sub-region will be arbitrary, undermine its strategy and impact on the environment, all contrary to the proper planning of the sub-region.

⁵ Augmenting the Evidence Base for the Examination in Public of the South East Plan, Roger Tym & Partners May 2006