



## **Partnership for Urban South Hampshire**

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Hazel Blears MP  
Secretary of State for Communities and Local Government  
Elland House  
Bressenden Place  
London  
SW1E 5DU

18 December 2007

Dear Secretary of State

### **Interpretation of PPS3**

I am contacting you to seek confirmation over the interpretation of a key aspect of PPS3 in the context of urban South Hampshire.

I chair the Joint Committee of the Partnership for Urban South Hampshire (PUSH) which comprises the eleven authorities whose area, or part thereof, is within South Hampshire. PUSH has set itself a target of raising the rate of economic growth in South Hampshire from around 2.75% per annum now to 3.5% by 2026. PUSH is committed to delivering the new business development and housebuilding which is needed to achieve that economic growth target. This means 80,000 new homes during 2006 – 2026 which is around 20 percent above the current RPG housebuilding rate. Reflecting this, PUSH was selected last year as a New Growth Point.

The spatial strategy for South Hampshire is that around two thirds of the 80,000 new homes will be provided through existing allocations and other brownfield sites in existing urban areas. The remainder will be new greenfield allocations: two Strategic Development Areas (of 6,000 and 10,000 homes) and several smaller urban extensions. The total amount of development and the spatial distribution have been endorsed by the South East Plan EiP Panel. They also praised the soundness of the evidence base which lies behind the strategy.

The constituent PUSH authorities are now preparing their Local Development Documents (LDDs) which will enable delivery of this housebuilding. All these authorities are committed to their share of the 80,000 homes target. They also intend, in line with PPS3, to maximise the proportion of this target which is on identified sites. However, in the context of South Hampshire – with many local authorities comprising areas which are already wholly or largely developed – we believe that it will not be possible to identify every site in LDDs.

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Housebuilding on sites not identified in Local Plans has been a significant and sustained contributor to housing supply in South Hampshire. Unidentified sites of this sort have accounted for an increasing number of all new dwellings built in the PUSH authorities, rising from 2324 in 2000/1 to 3133 in 2005/6. The latter represents 60 per cent of all dwellings built. This gives confidence that such sites can provide for a proportion of future housing supply.

PUSH is therefore concerned by the statement in paragraph 59 of PPS3 that *“allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified”*. We do not take issue with the size of such allowances having to be based on robust evidence including the Strategic Housing Land Assessment required by PPS3, but the tenor of the paragraph makes such allowances an exception to the rule.

PUSH believes that it will be possible for many South Hampshire Authorities to demonstrate through their Strategic Housing Land Assessments and other evidence that some allowance for unidentified/windfall sites is justified and appropriate in their area. The point at issue, however, is that if many – if not the majority – of the ten PUSH authorities do this, it would appear to be at odds with PPS3 regarding such allowances as exceptions to the rule. This prompts concern about how Planning Inspectors would interpret the position of South Hampshire authorities in relation to this wording, compared to a situation where similar evidence was presented by a single authority.

I understand that Ministers take the view that PPS3 does not prevent authorities from including an allowance for windfalls in their plans if they can demonstrate why they cannot identify sufficient sites for housing. I believe that Ministers do recognise that in some urban areas this is likely to be the case.

Whilst this may be a matter which my colleagues in other areas may raise with you, as Chair of PUSH I seek your re-assurance that our robust and carefully evidenced strategy for South Hampshire will not be undermined by an interpretation of PPS3 which rules out an allowance for unidentified sites in Local Development Documents, subject of course to the size of such allowances being based on sound evidence which demonstrates that authorities have taken reasonable steps to identify as many as sites as possible.

I await hearing from you.

Yours sincerely

A handwritten signature in black ink that reads "Sean Woodward". The signature is written in a cursive, flowing style.

Councillor Séan D T Woodward  
Chairman  
Partnership for Urban South Hampshire