



## **The Partnership for Urban South Hampshire (PUSH) response to the Housing Green Paper**

### **Homes for the Future: more affordable, more sustainable**

PUSH welcomes the opportunity to comment on the Housing Green Paper, it wishes to make the following points (the references in parentheses next to each heading refer to the chapters and paragraphs in the Green Paper):-

#### **More new homes** (Chapter 1 & Chapter 2, Paragraphs 1-9)

- South Hampshire has already accepted a 20% increase in house building in the draft South East Plan compared to the previous rate in Regional Planning Guidance. The currently proposed figure has been supported by the Panel which conducted the Examination-in-Public of the Plan. They commented that an even higher rate of house building would *“upset this balanced strategy... with the prospect that out-commuting levels would increase”* and that it would also *“introduce unacceptable risk particularly in meeting Habitats Directive requirements and avoiding flood risk”*.

#### **Affordable Homes** (Chapter 8)

- Any increase in Government funding for affordable housing is welcome, but the sum proposed in the Green Paper is unlikely to be sufficient. It is only two thirds of that calculated by the Local Government Association as being required.
- Greater freedoms for Councils to construct homes themselves and to retain income/capital receipts are welcomed, though many would argue that such matters should always have been matters for local discretion.

#### **Public Sector roles** (Chapter 3)

- Most local authorities actively manage their property portfolios and dispose of surplus land. Many of the local authority surplus sites with best prospects for housing development have probably already been sold, so there is a danger that the Green Paper overestimates the potential yield from this source.
- Any pressure which Government can bring to bear on the health service and MoD to progress the disposal of surplus land would be welcome, as there has been indecision/delays/withdrawals of sites by these agencies in respect of land in Hampshire in the past.
- PUSH would wish to explore further with Government the possibility of establishing a Local Housing Company in South Hampshire.

### **Greener homes** (Chapter 7)

- The Green Paper proposals to improve the environmental performance of new homes are welcome, but the document is silent on how to achieve the same standards in existing housing. The Government needs to address this omission, as the existing stock in 2007 will still constitute the bulk of the housing stock in, say, 30 years time.

### **Speedier delivery** (Chapter 2 & Chapter 4, paragraph 11)

- The South East Plan Examination-in-Public Panel has recommended an increase in housing provision across the region. That recommendation took account of a wide range of views and information, and should not be ignored by Government simply because of the publication of a revised national target (which unlike the draft South East Plan has undergone no testing or scrutiny). Any Government desire for an even higher house building target should be tested through the review of the South East Plan and not be imposed by Government through its finalisation of the current Plan.
- The Secretary of State's powers to intervene in decisions on planning applications should be used sparingly, given the Planning White Paper's commitment to reduce Ministerial call-ins and intervention in appeals. The apparent contradiction between the Green and White Papers on this matter suggest a lack of joined-up thinking within Government.
- Planning and economic strategies are to be drawn up by RDAs and reflect both the views of councils and be signed off by Ministers. This change will increase the influence of Ministers and commensurately reduce the ability of local people to have their say.
- Housing and Planning Delivery Grant (HPDG) proposals, including the extension of it to more councils, are supported in principle. However, the HPDG pot must have sufficient resources to provide real incentives to councils.

### **Recycling homes and land** (Chapter 4)

- The target of 60% of new housing being built on brownfield land is expected to be met (but only just) in South Hampshire notwithstanding the increase in total house building proposed here by the South East Plan compared to past rates. Any move by Government to increase the South Hampshire total still further would jeopardise achievement of the 60% brownfield target.
- The statement in PPS3 Housing ( paragraph 59) - that windfall sites (which are predominantly brownfield sites) cannot normally be taken into account in planning future housing land supply - will further jeopardise achievement of the 60% target.



### **Infrastructure** (Chapter 5)

- The promised additional £300 million for infrastructure is welcome in principle but as the funding total will be spread over a larger number of Growth Points, it will mean little more for each locality. In this regard, PUSH would echo the call of the South East Plan EiP Panel for increased Government investment in affordable housing and infrastructure, and for a longer term Government commitment on such funding.
- PUSH has previously expressed support for a tariff based system in preference to the introduction of the Planning Gain Supplement, which would allow authorities to tailor financial contributions to local needs.