Partnership for Urban South Hampshire
Office of the Executive Leader, Fareham Borough Council,
Civic Offices, Civic Way, FAREHAM, Hampshire, PO16 7PU
T: 01329 824752 **M**: 07825 300637 F: 01329 824354
Email: swoodward@fareham.gov.uk

Planning Policy Consultation Team
Ministry of Housing, Communities and Local Government
3rd floor, South East Fry Building
2 Marsham Street
London
SW1P 4DF
planningpolicyconsultation@communities.gsi.gov.uk

By email
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Dear whom it may concern,

Response to the Draft Revised National Planning Policy Framework Consultation

On 5th March 2018, the Government published the *Draft Revised National Planning Policy Framework* for consultation. Please find below the Partnership for Urban South Hampshire's response to these proposals. It is worth noting that due to our joint working across multiple local authorities in South Hampshire, that our response to this is a broad one to encompass those of the partnership and will not focus on individual questions as such.

The Partnership for Urban South Hampshire (PUSH) was formed in 2003 and now comprises twelve South Hampshire local authorities comprising the unitary authorities of Portsmouth and Southampton and Isle of Wight; Hampshire County Council and the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley, New Forest and Winchester. PUSH continues to work collaboratively with partner agencies in the sub region, including the Solent LEP and key Government departments, to ensure joined up strategies, pooling of resources and delivery of transformational programmes that focus on better outcomes for local people.

PUSH supports the Government's commitment to 'fix the broken housing market' and recognises that the need to agree locally to a proportion of a national housing target has some value particularly in areas of the country which are not positively looking to meet local housing need. PUSH also appreciates the additional proposals to bring forward more land in the right places through the current consultation.

However, PUSH fundamentally disagrees with the proposed standard approach to assessing local housing need for number of reasons. The PUSH local authorities have worked jointly for a number of years across South Hampshire. While the PUSH Joint Committee has no statutory powers or functions, it plays a vital role in co-ordinating the preparation of sub-regional evidence and statements across the local authorities. The PUSH local authorities recognise the benefits of working together to support the sustainable economic growth of the sub-region and to facilitate the strategic planning functions necessary to support that growth, which is in line with current Government advice.

PUSH has been instrumental in agreeing a joined-up approach to addressing housing need over three housing market areas; Southampton, Portsmouth and Isle of Wight. This is evident in the fact that the PUSH local authorities published a Spatial Position Statement in June 2016, which sets out the overall need for, and a distribution of, development in South Hampshire to 2034. This Statement draws on evidence from the South Hampshire Objectively Assessed Housing Need (OAHN) Update Report published in April 2016, which updates and complements the Strategic Housing Market Assessment (SHMA) published in 2014. Furthermore, there are a number of evidence documents prepared through joint working by the PUSH local authorities that have helped inform the PUSH Spatial Position Statement. It is considered that this more collaborative and 'bottom-up' approach to responding to local housing needs over three housing market areas by PUSH is preferable to the 'top-down' standardised approach to housing need currently proposed by the Government. Over a relatively short time period, PUSH has established a joint position and evidence base from which individual authorities can progress their own Local Plans.

Primarily, the Government proposals upon helping authorities to meet unmet housing need from neighbouring authorities in our view is flawed in its approach. Different authorities are often at different stages of plan making, including their development. Therefore, if one authority is in a more advanced stage of plan-making than a neighbouring authority, they may not have sufficient evidence to substantiate their position of not being able to meet their need. These proposals could effectively slow plan-making, adversely affecting the first authority from advancing a plan. PUSH argues therefore that for an authority to successfully maintain that it cannot meet its need, its Local Plan would need to have been adopted before a neighbouring authority would be expected to see if it could accommodate their need. Furthermore, it appears that from a Government perspective that proposals for Local Plans to be considered sound need to meet the standard approach to housing as a minimum.

Also, unlike paragraph 9 of the previous consultation, *Planning for the right homes in the right places*, these Government proposals prescribe a definitive list of policies

that provide specific reasons restricting development nationally. Paragraph 9 of the previous consultation explained that after establishing the number of homes that are needed in the area, "local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need," mentioning Ancient Woodland, Green Belt, Areas of Outstanding National Beauty and Sites of Special Scientific Interest. The proposal also set out how local authorities "need to engage with other authorities through the duty to co-operate to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need." This is what PUSH has worked towards and established through the Spatial Position Statement. This has resulted in, for example, agreement between PUSH authorities that the protection of important strategic gaps such as the Meon Valley, which sits between the housing market areas of Southampton and Portsmouth, is supported. The Government's current round of consultation gives no or little protection to those authorities who have landscapes and countryside that do not fall under these listed designations but are clearly valued by PUSH authorities and its local communities. These continual changing objectives by Government could undermine and slow down local authorities positively plan-making under the existing regimes, which are successfully working with neighbouring authorities.

PUSH questions the focused and continued emphasis on local planning authorities for the main responsibility for housing delivery through these reforms, especially for those authorities who lack significant public land assets to be sustainably developed. Local planning authorities are responsible for permitting sustainable development in appropriate locations for local community benefit but not for delivery, except those authorities that have suitable land ownership. If the Government task local planning authorities with delivery, simply by reducing the length of permissions when viable and practical is inadequate for this proposed responsibility.

PUSH believes the Government needs to reconsider these proposals, and target reforms on those responsible at each stage of the delivery of housing. If developers fail to deliver development (i.e. housing completions) with suitable infrastructure (i.e. in line with local community and council aspirations) there is no recourse. To allocate less sustainable locations or more development would result in unnecessary concern from local communities and less sustainable development, which will have undesirable effects on existing and future generations, which subsequently undermines sustainable development.

If the Government introduces these proposals and imposes these burdens on local planning authorities, it would need to give councils suitable delivery mechanisms in the most sustainable locations. For example, the ability to new fast-track Compulsory

Purchase Order (CPO) powers to acquire land allocated for sustainable development at 'Existing Use Value.' Plus, appropriate compensation for disruption and relocation to those landowners and tenants affected in order that these sites are delivered. However without appropriate mechanisms, CPOs remains an unsuitable, costly and lengthy method for councils; PUSH awaits the results of Sir Oliver Letwin's review on these matters.

All of the aforementioned would lead to an incoherent decision-making process for local communities, as in effect national policy will simply distance local planning decisions, further undermining the plan-lead system and local authorities. As highlighted previously in our response to the *Planning for the right homes in the right places* consultation, if enacted, such reforms would significantly undermine the collaborative and beneficial work undertaken by PUSH.

We hope this submission will assist the Government with any changes and the shaping of the National Planning Policy Framework.

Yours sincerely,

Councillor Seán Woodward
Chairman of the Partnership for Urban South Hampshire