



Partnership for Urban South Hampshire

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Dear Sirs

Response to Housing White Paper – Fixing Our Broken Housing Market

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 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 as well as key Government Departments to ensure joined up strategies, pooling of resources and delivery of transformational programmes that focus on better outcomes for local people.

One of PUSH's main priorities is in providing a strategic basis for the delivery of housing and infrastructure across the sub-region of South Hampshire. The Spatial Position Statement 2034 is crucial in supporting individual councils in the preparation

and delivery of their Local Plans as well as meeting the crucial test of Duty to Co-operate

The White Paper was considered and debated by PUSH at its meeting on 14 March 2017 and it was agreed that a collective response on behalf of PUSH should be submitted. Therefore although individual councils will have submitted their responses to the 38 questions, this response does not seek to give a view on each of the questions but rather to provide a more general overview and comment on the White Paper, as follows:

Generally the white paper is welcomed as an important step towards helping build the homes that the country needs which is entirely in line with the PUSH Spatial Position Statement. It recognises the important role that local authorities play in achieving the broad aims and promises some levers and tools to help local authorities do their job. However, there is a view that the White Paper could be far more ambitious in terms of the support it offers to local authorities who, with the right support and flexibility, could do far more to build, or enable, the genuinely affordable homes that the people at the "sharp end" of the housing crisis need. The White Paper makes no reference to lifting the housing borrowing cap and this one measure could significantly support the local authority role in housing delivery.

It is worth noting that much of the White Paper, as it relates to local authorities, is about the planning system and making the planning system work better to deliver housing. This is an important message for local authorities within the PUSH area and local authorities will need to deliver the new houses that the area needs. However, PUSH is also well placed to support the co-ordinated activity to support the strategic planning of the area and better understanding of the infrastructure needed to support development and has a good track record in this area of activity. PUSH priorities paper is investigating whether more can be done to support and help each other to ensure that the planning teams have sufficient skills and capacity to play a proactive role in the delivery of the right homes in the right place supported by adequate infrastructure creating quality places.

Subject to the proposed methodology making sense, PUSH welcomes the standardised approach to assessing housing need and approaches to simplify the plan making process including additional tools to ensure that development actually happens. However, it is important that local authorities are given the freedom as to how to plan to meet the needs of its population and it is very important that national housing targets are not set on local communities. In terms of joint working across boundaries PUSH has a strong track record in this with the work on the Spatial Position Statement satisfactorily evidencing the Duty to Co-operate. It is important that the proposals for areas to produce a

“Statement of Common Ground” is sufficiently flexible to ensure that it shouldn’t add a whole new bureaucratic burden.

In terms of making more land available in the right places the proposals to increase the use of brown field land is broadly welcomed as are the proposals to increase densities (where this is appropriate in terms of the context of the area). However, there is an implication in the White Paper that brown field sites are easier to develop. This is not always the case and there can often be significant infrastructure costs associated with developing brown field sites in terms of, for example, flood defences, contaminated land and access for transport and utilities.

To deliver the housing that meets assessed need will require considerable investment in infrastructure. Local communities are far more likely to support new development if it comes with the infrastructure and services needed to support the development. The Housing Infrastructure Fund is welcomed as a mechanism to support the delivery of infrastructure led housing but for this to be effective local authorities will need flexibility for how this funding should be used. PUSH can have an important role in terms of coordinating the infrastructure requirements across the area. The recognition in the White Paper that the timely provision, or not, of utilities can have on development is welcomed but it is suggested that the White Paper does not go far enough in terms of helping local authorities to improve the situation.

The additional funding for planning functions through increase in planning fees is supported as are the proposals to introduce fees for appeals although this fee income should also come to the local authority. However, the review of the Section 106 funding of CIL will need to be considered carefully to ensure that it does not significantly detract from the availability of funding to support communities and the infrastructure needed to support development.

It should be recognised that the Housing Delivery Test is reasonable if the local authorities are genuinely given the powers, tools and resources to make sure that housing is delivered. The principles of the White Paper would seem to support this but it will be important to see the detail of how things will actually work in practice before it can definitely be said that the Housing Delivery Test and the proposed thresholds are relevant.

In terms of diversifying the housing market again there is much to be welcomed. Having certainty for rental income beyond 2020 is positive and will allow for longer term certainty for the Housing Revenue Account. However, the fact that the White Paper is silent on borrowing freedoms and the ability to retain 100% of Right to Buy Receipts is not positive since this would help local authorities build some of the affordable houses that an area needs. Similarly the recognition that alternative delivery vehicles can play an important role in local housing delivery should be welcomed but the suggestion that tenants may have Right to Buy opportunities is likely to make these approaches less

attractive. It is also likely to take a period of time before the market is diversified and as such it is important that local authorities are given the flexibility to build more affordable homes now.

Much of the debate at the meeting on 14 March 2017 was around what was not in the White Paper and a shared concern that the opportunity to use this White Paper to unblock the real restrictions that prevent housing delivery may be lost. A number of specific suggestions were made for future consideration

- Allocated sites should be set aside if they do not come forward in the original timeframe, with some form of reserve site list agreed at Plan inspection stage.
- Consider introducing a tax/levy on undelivered houses as a percentage of the ultimate Council Tax fee.
- Increase the ability for the Local Authority to use Compulsory Purchase Orders (CPO) on stalled sites at £66% of the market value to enable the development of these to be accelerated.
- Introduce some form of delivery timeline bond that expires and is paid if the site does not come forward within a reasonable timeframe

We hope this submission will assist the Government in shaping the White Paper and in developing the necessary technical documents that are needed to support its delivery and successful implementation.

Yours sincerely,

Councillor Seán Woodward
Chairman of the Partnership for Urban South Hampshire