

Housing Delivery Action Plan

March 2022

Housing Delivery Action Plan

Purpose of this paper	To identify the reasons for housing under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery. To provide an annual update based on the Councils latest position and Housing Delivery Test (HDT) results.
Why?	A Housing Delivery Action Plan is required to be published where the Housing Delivery Test indicates that delivery has fallen below 95% of the Council's housing requirement over the previous three years.
Objectives	<ul style="list-style-type: none">• To assess the causes of under-delivery.• To identify actions to increase housing delivery in future years.

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Contents

Page

1. INTRODUCTION	1
2. THE EMERGING LOCAL PLAN	4
3. HOUSING DELIVERY ANALYSIS	5
4. KEY ACTIONS AND RESPONSES	14
5. MONITORING.....	16

1. Introduction

- 1.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery for plan-making authorities. Paragraph 76 of the National Planning Policy Framework (NPPF) states that:

“Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.”

- 1.2 This action plan identifies reasons for housing under-delivery and sets out measures the Council is taking to reduce further under-delivery and improve delivery going forwards. It follows the publication of the 2021 Housing Delivery Test measurement for Havant Borough in January 2022.

Background

- 1.3 As a pro-development authority, the Council started preparation of the Havant Borough Local Plan to update the housing requirement since 2016. In doing so, the Council has embraced the obligations by Government, through the NPPF to aid in achieving the national target of 300,000 new homes being built per year. Through the standard method, this meant 504 homes per year for the Borough at the date of the submission of the Havant Borough Local Plan (HBLP).
- 1.4 The HBLP was submitted for Examination on 12th February 2021. Stage 1 Hearings on the strategic matters took place in July 2021, and the Inspectors’ Interim Findings report was subsequently published in November 2021. The findings recommend a withdrawal of the HBLP from Examination, which will obviously result in a longer period before a new Local Plan is in place.
- 1.5 The adopted housing requirement of 315 dwellings per annum set out by the Core Strategy (2011) is now more than five years old. A step change in housing delivery is therefore needed to deliver the scale of housing need under the standard method, particularly in the context of the under-delivery of housing in Havant Borough in recent years.
- 1.6 In late 2018, the Dutch Case¹ resulted in the Council being unable to permit most housing developments for nearly 18 months. This had direct implications for the Borough’s Housing Delivery Test measurement and the Five Year Housing Land Supply. Whilst the 2021 Housing Delivery Test (HDT) measurement includes a relaxation to the ‘number of homes required’ during 2019/20 and 2020/21, this is insufficient relative to the scale of the issue the Dutch Case presented or the scale it leaves behind.

¹ Cooperatie Mobilisation for the Environment UA and College van gedeputeerde staten van Noord-Brabant (Case C-293/17 and C294/17) available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CA0293>

The Housing Delivery Test

- 1.7 The HDT was introduced following the publication of the 2017 Housing White Paper² and was designed to hold local authorities to account in terms of ensuring the delivery of new homes in their area. This was to counterbalance the suite of measures given to local authorities to ensure developers build homes quickly.
- 1.8 Depending on the measurement of housing delivery under the HDT, a different set of policies from the National Planning Policy Framework (NPPF) apply:
- The authority is required to publish an ‘action plan’ if housing delivery falls below 95%;
 - Together with an action plan, a 20% buffer is required to be added to the five-year housing land supply requirement if delivery falls below 85%; and
 - Together with an action plan and 20% buffer, there is a presumption in favour of sustainable development if housing delivery falls below 75%.
- 1.9 This action plan is updated annually following the publication of the Government’s Housing Delivery Test results where housing delivery falls below 95%. 2021 has generated a HDT result of 74% and therefore a presumption in favour of sustainable development applies in Havant borough.

The measurement

- 1.10 A summary of HDT measurements to date can be seen below. As the 2021 HDT falls below 95%, an action plan is required.

Year	Housing Delivery Test Results
2018	147%
2019	101%
2020	72%
2021	74%

- 1.11 Housing delivery is complex and whilst this action plan sets out what the Council is doing to increase housing delivery, there is only so much within its control. It is the Council’s opinion that it is also incumbent on landowners and developers to ensure housing sites come forward in a timely manner and are built out swiftly once planning permissions are granted.

Decision taking

- 1.12 The NPPF indicates that the presumption in favour of sustainable development (paragraph 11d) applies to applications involving the provision of housing, and suggests that policies which are “most important” (usually housing policies), for determining the application are out of date where:

² [Department for Communities and Local Government – Fixing our broken housing market – February 2017](#)

- The local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or
- Where the Housing Delivery Test indicates that housing delivery is less than 75% over the previous three years.

1.13 The Five Year Housing Land Supply Update (November 2021) indicates the Council is not currently able to demonstrate a five-year supply of deliverable sites.

1.14 In the context of the titled balance, planning permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Furthermore, the NPPF is clear that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. In Havant Borough, this comprises of:

- The Havant Borough Local Plan (Core Strategy) adopted March 2011
- The Havant Borough Local Plan (Allocations Plan) adopted July 2014
- The Hampshire Minerals and Waste Plan adopted October 2013
- The Emsworth Neighbourhood Plan 'made' September 2021

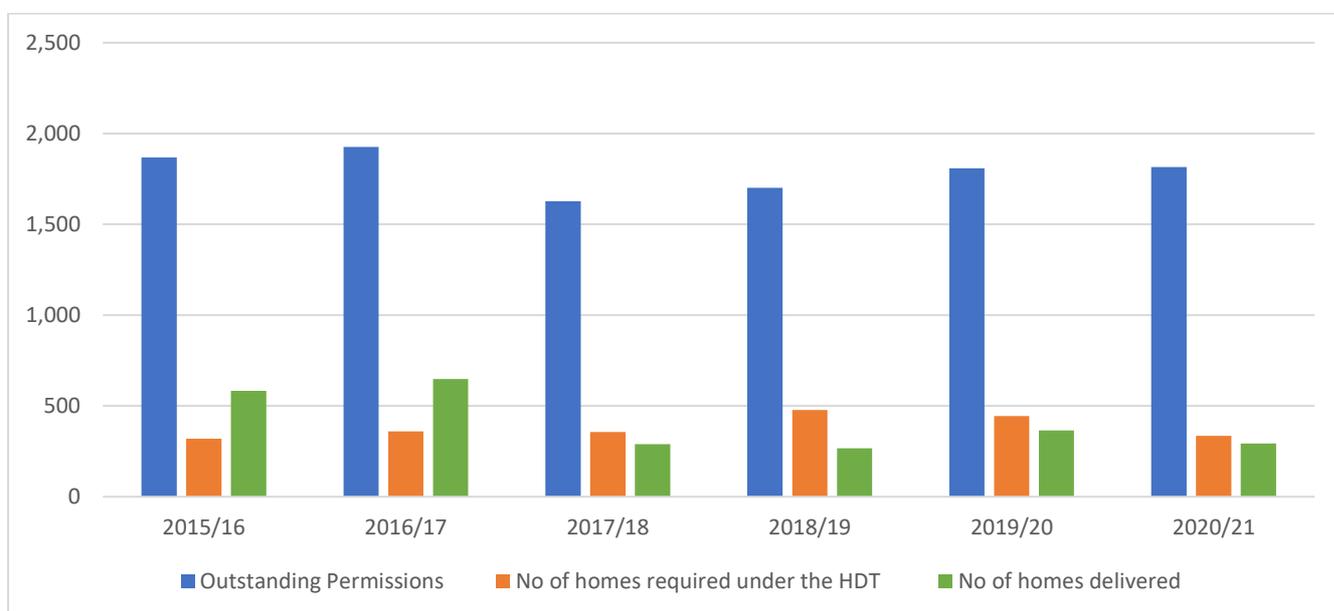
2. The emerging Local Plan

- 2.1 The Council started preparation of the Havant Borough Local Plan (HBLP) in 2016. In doing so, the Council embraced the need to update the housing requirement in line with the Government's standard method. This also involved the adoption of a [Local Plan Housing Statement](#) in December 2016 which took an innovative approach by identifying sites the Council considered suitable for 'early release' in advance of the HBLP.
- 2.2 The Local Plan Housing Statement made clear where the Council would accept the principle of high quality development on sites outside of the development plan whilst the Local Plan was being reviewed. As a result, planning permission was granted on two of the sites identified within it, in addition to pre-application engagement and application submissions on several more. The Council continued to take a similar approach to proposed allocations in the emerging HBLP whilst it was in production.
- 2.3 However, the small, constrained and heavily urbanised nature of Havant Borough means it was necessary to assess the suitability of land throughout the preparation of the HBLP. The Council's [Constraints and Supply Analysis](#) provides some on the context of the finite amount of undeveloped land available for development in Havant Borough. At the time the HBLP was submitted, the Plan demonstrated the Council's commitment to meet the Borough's objectively assessed need in full.
- 2.4 The HBLP was submitted for Examination on 12th February 2021. Stage 1 Hearings on the strategic matters took place in July 2021, and the Inspectors' Interim Findings report were subsequently published in November 2021. The Inspectors' Interim Findings raise concerns in relation to the deliverability of a number of housing sites and highlight the Council may not be able to meet its housing need as a result. The Inspectors highlighted that further information or updates to evidence base studies are needed in relation to the deliverability of a number of housing sites which mean the Council may not be able to meet its housing need over the plan period.
- 2.5 Following the withdrawal of the HBLP from Examination, the Council is preparing a new Local Plan, which will address the concerns raised by the Inspectors' Interim Findings report in the context of the NPPF. This will include updating the Hayling Island Transport Assessment and further information in relation to the deliverability of housing sites including evidence to show that mitigation can be provided for a number of housing sites.
- 2.6 In the interim, the Council has adopted a Housing Delivery Position Statement which sets out how planning applications for housing not in accordance with the development plan will be considered. Significantly, it recognises that the 'titled balance' will apply to most planning applications for housing under the presumption in favour of sustainable development.

3. Housing Delivery Analysis

- 3.1 Havant Borough Council has an established reputation as an ‘open for business’ local authority. It engages positively with the development industry and local communities to realise the benefits that sustainable development can bring. Despite this, of the 1,816 dwellings with outstanding planning permissions on 1st April 2021, only 293 dwellings (16%) were completed during 2020/21.
- 3.2 The following bar chart summarises the number of outstanding planning permissions as of 1 April relative to the ‘number of homes required’ under the Housing Delivery Test and completions that monitoring year (1 April – 31 March). It shows that in all three years, the Council granted sufficient planning permissions far in excess of the ‘number of homes required’ under the Housing Delivery Test (HDT), but ‘number of homes delivered’ fell short in all three years.

Figure 1: Outstanding planning permissions relative to the number of homes required under the Housing Delivery Test results and the number of completions that monitoring year



- 3.3 Figure 1 illustrates that completions were particularly suppressed in years 2017/18 and 2018/19. 2019/20 saw a slight upturn in completions, but completions were down again in 2020/21 potentially as a result of the disruption caused by the national lockdowns.

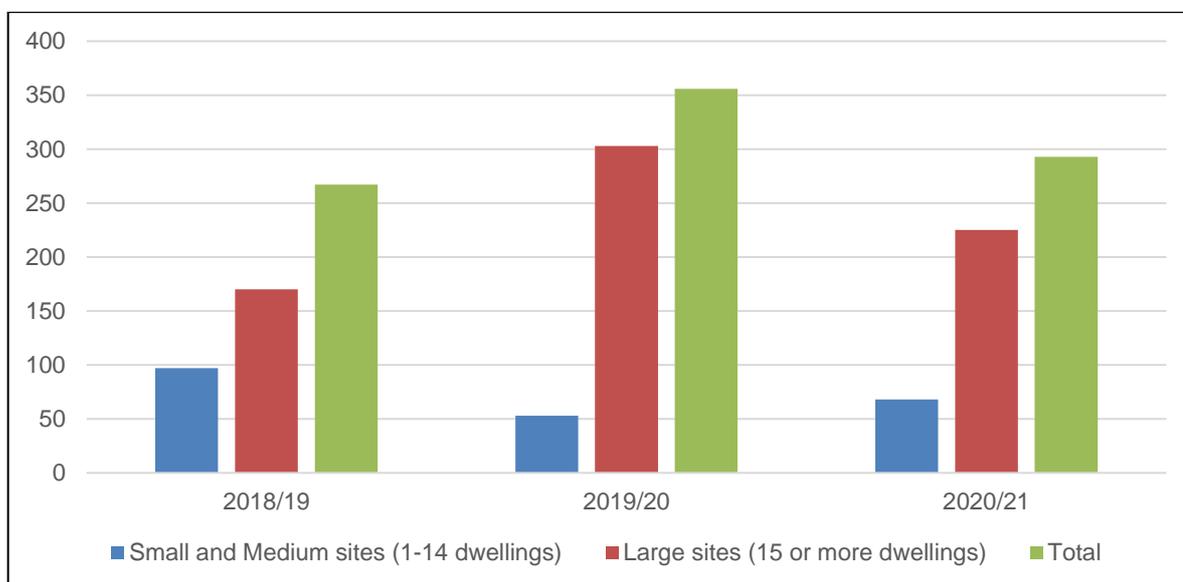
Sites contributing to housing supply

Analysis of housing completions 2017/18-2020/21

- 3.4 For the purposes of this exercise, sites have been broken down into small (0-10 dwellings), medium (11-14 dwellings) and large (15 or more dwellings) categories.

Figure 2: Analysis of completions according to contribution from site size

Number of Completions	2018/19	2019/20	2020/21
Small (1-10 dwellings)	84	53	68
Medium (11-14 dwellings)	13	0	0
Large (15 or more dwellings)	170	303	225
Total	267	356	293
Percentage of smaller sites	31.5%	14.9%	23.2%
Percentage of medium sites	4.9%	0.0%	0.0%
Total	36.3%	14.6%	23.2%



- 3.5 The analysis shows that small sites have continued to make a significant contribution to the housing completions across the three year period. Whilst there has been no contribution from medium sites during the last two years, there has been a significant upturn in the proportion of completions from large sites.
- 3.6 The nutrient neutrality issue presented by the Dutch Case stalled most housing development during 2018/19 and 2019/20 particularly on non-agricultural sites. By implication it would appear that large sites (15 dwellings or more) have made a greater contribution to housing delivery in the last few years. Evidence of this is reduced during 2020/21 where there has been a resurgence in the amount of development coming forward on small sites.

Sites identified through the Housing Statement

- 3.7 The Housing Statement (December 2016) identified a need for 11,250 homes between 2011 and 2036, based on the relevant objectively assessed need figure at the time. Taking completions,

outstanding planning permissions, windfall, and site allocations in the Allocations Plan (2014) into account, the Housing Statement recognised a need to find further sites to deliver 4,809 homes.

- 3.8 In order to address this gap, further sites on greenfield and previously developed urban extension sites were considered, and subsequently identified as being suitable for 'early release' through the Housing Statement.
- 3.9 Table 1 of the Housing Statement (re-produced below) shows the ten sites which the Council indicated that it would support the principle of residential development ahead of the adoption of the Havant Borough Local Plan, subject to compliance with the remainder of the policies in the Adopted Local Plan and the Guiding Principles in the Housing Statement.

Table 1: Sites that would supported in principle ahead of the HBLP being adopted

Site reference	Site	Indicative No. of dwellings
Emsworth		
UE67	Land to the rear of Redlands House	5
UE76	Land North of Long Copse Lane	260
UE02b	Land North and West of Selangor Avenue	154
Havant and Bedhampton		
UE28	Littlepark House, Bedhampton	47
UE30	Land South of Lower Road, Bedhampton	50
UE53	Land East of Castle Ave	60
UE55	Southleigh Park House	35
UE68	Forty Acres	300
Waterlooville		
UE70	Land East of College Road, Campdown	350
UE72	Land North of Fort Purbrook, Campdown	100
	Total	1361

- 3.10 The table shows that the ten Housing Statement sites had the potential to deliver 1,361 dwellings, with an additional 65 dwellings on newly identified, smaller sites within the urban area. It should be noted that Land North of Fort Purbrook, Redlands House, Land North and West of Selangor Avenue were not subsequently taken forward as allocations in the Local Plan, but the latter two sites have subsequently been built out³. The former is no longer available for development⁴.
- 3.11 The Housing Statement also identified Southleigh as a strategic site for the first time that would be explored further through the Local Plan's preparation process.
- 3.12 The Housing Statement reduced the shortfall between the number of sites available to provide homes and the scale of objectively assessed need. However, the Housing Statement indicated a significant gap remained between objectively assessed need for housing and the available supply.

³ APP/18/00229; APP/18/00230 Redlands House and APP/16/00774 Land North and West of Selangor Avenue

⁴ WV109 in the Council's [Strategic Housing Land Availability Assessment](#)

Despite this, the Council persevered to assesses the suitability of sites and the submitted HBLP set out that the Borough's objectively assessed need would be met in full by 2037.

- 3.13 Since the release of the Housing Statement in December 2016, Table 2 shows that only three of the ten sites have been granted planning permission with the potential to deliver 556 dwellings. Yet Land North and West of Selangor Avenue (APP/16/00774) is the only site to have subsequently commenced and has been built out (146 dwellings), representing just 10% of the total development potential from the Housing Statement sites. Forty Acres (APP/18/00450) has now commenced, with completions expected during 21/22.
- 3.14 This was disappointing given the innovative approach taken by the Council in adopting the Housing Statement at the start of the Local Plan review. However, several other sites were either progressed at the pre-application stage or submitted as planning application. These are summarised in Table 3.

Table 2: Sites granted planning permission under the jurisdiction of the Housing Statement

App/SHLAA Ref	Site Name	No of dwellings	Housing Statement site?	HBLP allocation?	Notes
<i>Sites granted planning permission under the jurisdiction of the Housing Statement</i>					
APP/16/00774	Land North and West of Selangor	147	✓	*	Site well under construction
APP/17/00863	Southleigh Park House	90	✓	✓	Not yet commenced
APP/18/00450	Forty Acres	320	✓	✓	Revised planning permission (reference APP/21/00605) to include additional 34 units

Proposed allocations in the Local Plan

- 3.15 Planning applications on a number of other Housing Statement sites have since been submitted. However, they have done so in the context of proposed allocations in the HBLP, with a number of planning applications submitted whilst the HBLP was at Examination. As evidenced by the table below, the Council has been willing to support the principle of development on a number of sites in advance of the HBLP.
- 3.16 It is further evidence that the Council is doing everything it can in order to boost housing delivery in Havant Borough.

Table 3: Sites granted planning permission in the context of their emerging HBLP allocation

App/SHLAA Ref	Site Name	No of dwellings	Housing Statement site?	HBLP allocation?	Notes
<i>Sites proposed for allocation in the now withdrawn HBLP with planning permission</i>					
APP/19/00427	Land South of Lower Road	50	✓	✓	Granted on appeal
APP/19/00007	Camp Field, Bartons Road	72	*	✓	Non-material amendment (reference APP/21/01097)
APP/18/01033	Land East of Castle Avenue (phase 1)	69	✓	✓	Commenced

App/SHLAA Ref	Site Name	No of dwellings	Housing Statement site?	HBLP allocation?	Notes
APP/19/00768)	Land rear of 15-27 Horndean Road	16	x	✓	Commenced
APP/18/00724	Land north of Sinah Lane	195	x	✓	Pre-commencement requirements for a bird refuge

Cause analysis

Nutrient neutrality

- 3.17 The Council launched its own bespoke solution to addressing the need for development to be nutrient neutral at Warblington Farm⁵ in August 2020. This innovative approach is now supported by a range of other mitigation schemes across South Hampshire⁶. Prior to the launch of the Council's strategic mitigation scheme, an estimated 242 homes were directly stalled and a further 409 significantly or principally backlogged by this issue.
- 3.18 Whilst there was an initial slow but steady take up of the Council's strategic mitigation scheme, the Council has sold 473 kilograms of nitrogen at the time of writing from Phase 1 over a 16 month period.
- 3.19 Whilst schemes on smaller sites are now being delivered, the nutrient neutrality issue has left a lasting legacy as completions were reduced following the Dutch case in late 2018 until the Council's mitigation scheme was launched in August 2020. The shortfall in housing delivery during this 18 month period has left a lasting legacy reflected in the Borough's Housing Delivery Test result.

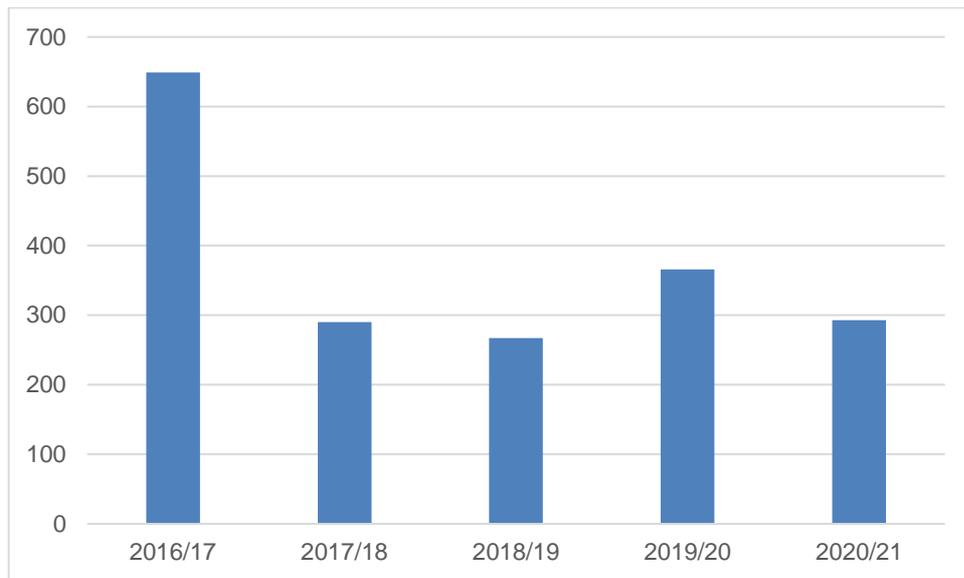
Macro-economic uncertainty and Covid-19

- 3.20 The impact of nutrient neutrality on housing delivery in Havant borough combined with macro-economic uncertainty have compounded housing delivery in recent years. Whilst the five-year land supply and Housing Delivery Test are intended to incentivise housing delivery, these issues are out of the Council's control.

⁵ For information, please see [Position Statement and Mitigation Plan for Nutrient Neutral Development \(August 2020\)](#).

⁶ [Potential mitigation schemes available to developers](#)

Figure 3: Number of housing completions (net) 2016/17-2020/21



3.21 Figure 3 shows that whilst completions saw a modest rise in 2019/21 with 366 dwellings completed this has dropped back down to 293 in 2021/22. These are much lower figures compared to the completion figure achieved in 2016/17 (649 dwellings) prior to the impact of Covid and the Dutch Case.

The complex nature of sites in Havant Borough

- 3.22 In addition to the sites included in Table 3, the Council has received a number of applications on sites that were proposed for allocation in the HBLP. A number of planning applications were submitted whilst the HBLP was at Examination, including housing proposals on 'omission sites' – sites that were not proposed for inclusion in the Plan. This reflects the Borough's current five year housing land supply position and Housing Delivery Test result which means that the presumption in favour of sustainable development, the 'tilted balance', applies in Havant Borough.
- 3.23 In contrast, a number of planning applications have been in the system for some time, reflecting the complex nature of these sites. In a number of cases, the Inspectors' Interim Findings highlighted the need to provide further information in relation to mitigation, notably that of Campdown (Last East of College Road) and Rook Farm (Land off St Marys Road).
- 3.24 The key issues affecting the 'live' major housing applications are summarised in Table 4 below.

Table 4: 'Live' major housing applications

Ref No	Address	HBLP allocation?	Application Type	No of dwellings	Validation Date	Key Issues
APP/18/00234	Wellington Way, Waterlooville	Part of KP2	Full	264	March 2018	Awaiting formal update from the applicant
APP/19/00224	Padnell Grange, Padnell Road, Waterlooville	✓	Full	86	March 2019	Protracted discussions regarding design and layout, and the need to retain Padnell Grange as a non-designated heritage asset. Applicant changed from Bellway Homes to the Borrow Foundation in April 2021.
APP/19/01101	Land East of College Road, Campdown, Waterlooville	✓	Hybrid	130 (Full) 650 (Outline)	December 2019	Following consultation responses from Historic England and Natural England, significant amendments are required to address highway, layout and design concerns. Inspectors' Interim findings highlight the need to provide further information re. heritage and habitat mitigation.
APP/19/01226	Land west of Coldharbour Farm	✓	Full	44	January 2020	Key outstanding issue relates to flood risk and the level of access required to avoid this. Revised flood risk information received in December 2021 and subject to consultation with the Environment Agency.
APP/20/00363	The Coal Yard, 178A West Street Havant	Within the built up area	Full	20	May 2020	Previous refusal relating to flood risk and highway issues. Applicant suggests these issues can be overcome.
APP/20/00658	Former Scottish and Southern Electric site, Bartons Road, Havant	✓	Full	175	October 2020	Application includes two drive-through restaurants and is for a greater quantum of development than envisaged by the allocation in the Adopted Local Plan (90 dwellings). Concerns regarding density and layout remain.
APP/21/00678 (APP/19/00007)	Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant	✓	Reserved Matters	70	July 2021	Key outstanding issues relating to ecology, highways and layout/landscaping issues. Revised information submitted December 2021.

Ref No	Address	HBLP allocation?	Application Type	No of dwellings	Validation Date	Key Issues
APP/21/00647	Land south of The Mallards and west of Langstone Road, Havant (Southmere Field)	✘	Outline	65	August 2021	Principle of development not in accordance with the Development Plan – site not included in the withdrawn HBLP. Large number of objections received. Key issues include transport considerations following the Inspectors' Interim Findings and mitigation for Solent Waders and nutrient neutrality.
APP/21/00893	Land north of Long Copse Lane, Emsworth	✓	Outline	210	September 2021	Application valid and consultations underway. Large number of objections received.
APP/21/00989	Cabbagefield Row, Leigh Park	✓	Outline	150	September 2021	Key issues include trees and layout, the latter of which involves Passivhaus principles but with implications for the public realm.
APP/21/00857	Land at Sinah Lane, Hayling Island	✓	Variation of condition	195	September 2021	Minor changes to planning permission reference APP/18/00724.
APP/21/01071	Land south of Lower Road and west of Old Manor Farm, Havant	✓	Outline	43	October 2021	Principle of development not in accordance with the Development Plan – site not included as an allocation in the withdrawn Havant Borough Local Plan. Large number of objections received.
APP/21/00931	Dairy Crest Depot, Dunsbury Way, Havant	Within the built up area	Outline	31	October 2021	Reduction in number of units compared to planning permission reference APP/18/01109 (74 dwellings). Application withdrawn in January 2022.
APP/21/01010	Land east of St Georges Avenue, Havant		Full	194	October 2021	Key issue includes implications for the layout with a need to ensure land is safeguarded for A27 Junction improvements associated with the Southleigh Strategic site.
APP/21/01434	Rook Farm, land off St Mary's Road, Hayling Island	✘	Outline	300	January 2022	Quantum of development less than envisaged by the allocation H27 ('about' 390 dwellings). Inspectors' Interim findings highlight the need to provide further information re. habitat mitigation.

Summary

- 3.25 The Council has held no control over the issues of the Dutch Case or the macroeconomic uncertainty with the Covid-19 pandemic. The Dutch Case impacted housing delivery significantly and the relaxation of the 'number of homes required' in the 2021 HDT is not sufficient to offset this. With housing delivery suppressed in recent years, there is a need for the Council to deliver an even greater step change in housing delivery to meet its objectively assessed need. This is considered to be extremely challenging in the context of the Borough's available housing land supply.
- 3.26 Whilst the Council sought to identify further sites to meet the Borough's housing need early on in the preparation of the HBLP, there has been relatively limited uptake from the development industry, and not enough homes have been delivered as a result. Whilst there are a number of further planning applications on sites now in the system in the context of their emerging allocations in the HBLP, these sites are not without environmental and technical constraints and progress on their determination has been slow as the evidence has not been provided showing how those constraints can be overcome.
- 3.27 Despite the HBLP being withdrawn, the Council will continue to support the principle of development on sites that were proposed as allocations in the context of five year housing land supply. In the context of Inspectors' Interim Findings and the Council's decision to withdraw the HBLP from Examination in particular, the following section sets out the steps and actions the Council is taking to address the under delivery and boost housing supply in Havant Borough.

4. Key Actions and Responses

Short term actions

Housing Delivery Position Statement

- 4.1 In the context of the Council's current housing land supply and Housing Delivery Test, the Council recognises the need to significantly boost the supply of housing in Havant Borough.
- 4.2 A key action is for the Council to put in place a new Position Statement which sets out how planning applications for housing not in accordance with the Development Plan will be considered. Development proposals which accord with the Development Plan will continue to be permitted without delay.
- 4.3 In the context of the characteristics of the Borough with various international nature conservation designations, and other inland natural and heritage designations it means that it is even more important that the Council is able to resist inappropriate development, and continue securing high quality development schemes. The Position Statement recognises that additional sites beyond those proposed as allocations (in the now withdrawn HBLP) will be needed and allows for development on sites where the principle was not previously identified.
- 4.4 The Position Statement does not of course replace the Development Plan for decision making purposes. Only a new Local Plan can ensure that the Borough's objectively assessed needs are met in a sustainable manner.

Nutrient neutrality mitigation

- 4.5 Havant Borough was one of the first local planning authorities to have secured an off-site strategic mitigation scheme to address the issue of nutrient neutrality, which launched in August 2020. Alongside this, the Council undertook a marketing campaign including press releases and a Ministerial site visit to publicise the launch of the scheme to developers, investors and landowners. This is primarily targeted at development schemes where it is not possible to achieve nutrient neutrality on site.
- 4.6 The Council sees the implementation of the strategic mitigation package for nutrient neutrality as being key to enabling housing delivery and economic recovery following the pandemic.

Medium term actions

Town centre regeneration

- 4.7 The Council has an ambitious regeneration agenda and is taking an interventionist approach to regeneration of its town centres and Hayling Island Seafront. This includes substantial high-density residential development on in order to maximise their accessibility to public transport. The Council is investing in bringing these sites forward at pace, although they do contain challenges in terms of viability and land assembly.
- 4.8 This approach is necessary in order to boost economic growth and opportunities in the town centres, reinventing them for the 21st century. The approach is also necessary in order to boost

housing supply on brownfield sites in order to increase housing supply and address the Borough's housing need, with the Council playing an active role in development opportunities.

Southleigh Strategic site

- 4.9 Southleigh, which is between the existing settlements of Denvilles and Emsworth has been identified by the Council as a strategic site for housing delivery since 2016, and is capable of providing around 2,100 dwellings.
- 4.10 Given the scale of the development proposed, significant infrastructure improvements will need to be delivered to make the new community sustainable. Due to the lead-in timescales needed to plan, obtain consent, and build the scheme, the Council will work in partnership with the landowners and interested delivery partners to bring about this large development.

A new Local Plan

- 4.11 Following the withdrawal of the HBLP from Examination, the Council is preparing a new Local Plan, which will address the concerns raised by the Inspectors' Interim Findings report in the context of the NPPF. This will include discussions with neighbouring authorities regarding accommodating unmet housing need and updating any necessary evidence base, including the Hayling Island Transport Addendum.
- 4.12 In light of the Findings, the Council acknowledges that additional housing sites beyond those in the withdrawn HBLP will now be required to meet housing need in Havant Borough. This has led the Council to adopt an interim Housing Delivery Position Statement to manage housing delivery in the Borough.

Summary

- 4.13 As a pro-development authority, Havant Borough is doing a great deal to boost housing supply and get housing sites delivered. The adoption of the Housing Delivery Position Statement is key to this. However, it is important that this is done in a responsible way given the physical and environmental constraints which exist – indeed, the Inspectors' Interim Findings indicate that the Borough may not be sustainably able to meet its housing need. Furthermore, it is evident that a great deal of the remaining available sites are affected by complex technical constraints which means that it takes time for housing on these sites to be delivered.
- 4.14 The Housing Delivery Position Statement is intended to provide guidance on how sites not in accordance with the Development Plan should be considered, particularly in the context of the presumption in favour of sustainable development and the 'tilted balance'. As such, in seeking to justify a departure from the Development Plan, applicants are expected to demonstrate that proposals comply with the development quality standards in the Statement.
- 4.15 The Council's strategic mitigation scheme at Warblington Farm alongside other sub-regional mitigation schemes will, however, continue to provide off-site mitigation for sites unable to achieve nutrient neutrality on-site. This will be key for small and medium sized sites which have consistently made a consistent contribution to housing supply in Havant borough.

5. Monitoring

- 5.1 The Council will continue to monitor housing completions and engage with developers and landowners promoting sites to ensure housing numbers and densities are delivered as per expectations in the housing trajectory. The monitoring of housing completions shall continue to be undertaken on an annual basis to inform the HDT measurement.
- 5.2 The Council will also monitor the take-up of the strategic mitigation package at Warblington. This innovative approach is now supported by a range of other mitigation schemes across South Hampshire. The Council will continue to promote the mitigation scheme to developers and landowners, making it clear that Havant Borough is “open for business”.

