



Report to the Partnership for South Hampshire Joint Committee

Date: 30 September 2020

Report of: Claire Upton-Brown, Chairman PfSH Planning Officers Group

Subject: STATEMENT OF COMMON GROUND – REVISIONS AND UPDATE

SUMMARY

This report sets out proposed updates and revisions to the draft framework Statement of Common Ground (SoCG) to enable it to be signed as a formal SoCG by the PfSH authorities.

RECOMMENDATION

It is RECOMMENDED that the Joint Committee: -

- a) APPROVES the content of the Statement of Common Ground, attached at Appendix 1 to this report, that will lead to the production of a PfSH Joint Strategy;
- b) NOTES the summary of the Planning for the Future White Paper, set out at Appendix 2 to this report;
- c) DETERMINES whether PfSH should respond to the consultation and if so, the nature of the response; and
- d) AGREES that the detail of any PfSH response be delegated to the Chairman of the PfSH Planning Officers Group, following consultation with the Group and the Chairman of the Joint Committee.

INTRODUCTION

1. The Joint Committee agreed a draft framework for the Statement of Common Ground (SoCG) at its meeting in October 2019. The report also set out a broad, draft timetable for the five workstreams that were included in the draft framework for the SoCG. The Joint Committee received reports updating progress on the SoCG in February and July this year.

PROGRESS MADE ON STATEMENT OF COMMON GROUND

2. Since the appointment of Stantec and ITP to undertake the potential Strategic Development Opportunity Area (SDOA) comparative assessments and transport impact assessments and modelling, further progress has been made on this evidence workstream. Stantec have completed the Sustainability Appraisal and Habitat Regulations Assessment Scoping Report and undertaken sieve mapping and constraints mapping to finalise the list of potential SDOAs for further assessment. ITP are now progressing the transport impact assessments for those individual potential SDOAs, that will be used to inform the Sustainability Appraisal and Habitats Regulations Assessment of those individual locations.
3. Stantec have also been appointed to carry out the Economic, Employment and Commercial Needs (including logistics) Study. At the time of writing this report the inception meeting has been arranged and signing of the contract is being progressed.
4. Progress has been affected by the working restrictions experienced because of the coronavirus pandemic. Virtual meetings have continued, but the lack of opportunity for face to face meetings and discussion has led to tasks taking longer than would otherwise be expected. Whilst the immediate concern over availability of local authority staff resources appears to have reduced, it cannot be assumed that it will not become an issue again over the next year.
5. The Planning Officers Group (POG) has reviewed the timetable, information and evidence that is already available and the need for the evidence workstreams. It has concluded that at this time, it is not essential to undertake the Urban Capacity Assessment or the Housing Market Areas Housing Product Delivery Report to inform the new Joint Strategy. Whilst these workstreams would be helpful, they are not essential to the production of the new Joint Strategy.
6. In relation to the Urban Capacity Assessment, this is already largely covered by the Local Planning Authority (LPA) information on existing commitments. Windfalls and Strategic Housing Land Availability Assessment (SHLAA¹) sites (where they are within settlement boundaries and form part of the LPA's housing supply) are already included as commitments within the housing supply. It is too soon to understand the full implications and market reaction to the changes to permitted development rights and the potential loss of retail or employment uses to residential within urban areas. Any assumptions would be predictions or opinions without any real evidence to support them.

¹ Can also be referenced as HELAA, SLAA or SHELAA sites

Furthermore, any increase in urban capacity will be picked up as commitments, either when sites are allocated in local plans that have reached at least Reg 19 pre-submission consultation stage (before submission for examination) or through planning permissions.

7. With reference to the Housing Market Areas Housing Product Delivery Report, the POG has considered the potential scope of this report and how it might be undertaken. The POG agreed that it would not be appropriate to commission evidence on the need for affordable housing across the sub-region as this is done at LPA level and there would be potential for conflict with this evidence which would not be helpful for those producing local plans. The POG then considered the potential to draw together existing evidence on housing mix and specialist types of housing that could give a sub-regional picture. PfSH's consultant project manager has explored the potential to carry out the work on this basis with several consultants who are recognised nationally in this area of work. Given the complexity of the existing evidence base, the advice is that it would probably be quicker and more robust to produce a new study. Following the report back, the POG agreed that given the complexities and likely cost of this work, and the restriction to housing mix and specialist housing, this work is not essential to the new Joint Strategy and is better addressed through local plan evidence.

REVISIONS AND UPDATES TO THE STATEMENT OF COMMON GROUND

8. The main changes to the draft framework SoCG are set out below:
 - Removal of the Urban Capacity Assessment and Housing Market Areas Housing Product Delivery Report workstreams from the SoCG (covered in paragraphs 5 – 7 above)
 - Updating and inclusion of the timetable for the evidence base workstreams within the SoCG
 - Changing the base date from 2016 to 2020
 - Updating the housing need and housing supply information to reflect the recently published affordability ratios and estimated supply from 2020 to 2036
 - Inclusion of references to an additional workstream that PfSH is considering; to prepare a 'Greenprint for South Hampshire'.

Timetable

9. The procurement process for consultants to undertake the evidence base studies was delayed due to circumstances related to the coronavirus pandemic. Given the delays to commencing procurement of consultants that had already occurred since the Joint Committee agreed the broad draft timetable for the work in October 2019, the timetable has been reviewed and revised and is now included in the SoCG on page 22 of this report. This has been undertaken in the light of the detailed work programmes and methodologies produced by Stantec and ITP in relation to the comparative assessment and transport impact assessment and modelling workstream.

10. Stantec submitted a timetable as part of their bid for the Economic, Employment and Commercial Needs (including logistics) Study. However, this will need further revision as the contract will commence later than originally anticipated. It is expected that the final report can be presented to Joint Committee in quarter 1, 2021.

Base date

11. The POG has considered the content of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) and concluded that the SoCG could use a base date of 2020 in estimating housing need and supply across the sub-region. This has the effect of discounting any under-supply between 2016 – 20. The NPPG provides specific guidance as follows:

Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans?

The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.

Where an alternative approach to the standard method is used, past under delivery should be taken into account.

Paragraph: 011 Reference ID: 2a-011-20190220

Revision date: 20 02 2019

There is no equivalent reference relating to past over-delivery of new homes.

12. The change in base date has a significant effect on the total amount of housing need that needs to be planned for as under-supply between 2016 and 2020 no longer needs to be addressed. There are options to continue to plan for a 20 year time period (i.e. 2020 – 40), although the SoCG has been drafted to deal with the time period 2020 – 36.

Updates to housing need and supply information

13. The constituent LPAs have updated their housing need calculations according to the standard method by applying the latest affordability ratios that were published earlier this year. This has shown a significant reduction in the estimated quantum of housing need, beyond the effect of changing the base date to 2020, when compared to the figures in the draft framework SoCG considered by the Joint Committee last year. The notable changes are:
 - An increase in the annual requirement for Gosport due to the 40% cap on the increase from an up to date local plan no longer being applicable²;

² When relevant strategic policies for housing (i.e. the local plan) were adopted within the last 5 years, the standard method local housing needs figure is capped at 40% above the average annual housing

- A significant reduction in the annual requirement for the New Forest due to the application of the 40% cap on the increase from the recently adopted up to date local plans; and
 - The overall estimation of annual housing need in the PfSH sub-region has reduced from 5,376 dwellings per annum (dpa) to 5,225 dpa.
14. The constituent LPAs have also updated their housing supply figures to take account of completions up to April 2020 and making any necessary adjustments to the amount of supply beyond this date. An allowance has also been made for any supply from C2³ elderly persons accommodation (student accommodation was already included) using the ratios set out in the Housing Delivery Test Measurement Rule Book to give equivalent dwelling numbers.
 15. The updated supply figures show a small increase in the annual rate of supply, although it is likely that this is mainly due to sites that were expected to be delivered before 2020 being rephased to after 2020.
 16. The identified housing supply is expected to increase as LPAs make further progress with local plan production. This will be included within the supply when local plans reach Reg 19 (pre-submission consultation) stage. There are some risks to this approach moving forward if an inspector does not support sites at examination. For example, the Strategic Growth Option (North of Bishopstoke and Fair Oak) identified in the Reg 19 Eastleigh Local Plan has now had to be removed from the supply, as a result of the Inspector's post-hearing letter. However, it is considered appropriate to include supply in the current Reg 19 local plans across the PfSH area given that the relevant LPA considers the allocations to be sound. Members should note that Fareham and Gosport expect to publish pre-submission plans in the near future and any increase in supply will be taken into account in the next iteration of this SoCG.
 17. The outcome of using the latest housing need and supply figures and the change of base date to 2020 means that the estimated shortfall in housing provision has reduced from some 18,000 dwellings to approximately 11,000 dwellings. However, it should not be concluded that the housing shortfall issues have become significantly easier to resolve or that the housing need no longer exists. The end date for the period covered by the SoCG is already earlier than the end date of local plans that are being prepared now, so the housing shortfall that needs to be addressed in those local plans is understated in the SoCG. Furthermore, the government is currently consulting on a revised standard method for calculating local housing need. Depending on the outcome of the consultation, this is likely to result in a significant increase in the annual housing need to be addressed in the sub-region.

A Greenprint for South Hampshire

18. Elsewhere on this agenda is a report to consider the production of a 'Greenprint for South Hampshire'. Should members agree with the proposal, it would be appropriate to include references to this workstream within the

requirement set out in existing policies. The Gosport Borough Local Plan 2011-2029 was adopted in October 2015.

³ Town and Country Planning (Use Classes) Order 1987 (as amended)

SoCG. Additional text has been added at paragraph 3.17 of the SoCG, assuming that the Joint Committee agrees with the proposal. Should the Joint Committee decide not to pursue this workstream then the additional text would be removed.

NEXT STEPS

19. Subject to the Joint Committee agreeing the recommendation to approve the content of the SoCG, each individual Local Planning Authority and the County Council can then sign the document (subject to their own governance or delegation arrangements) and it can be published on the website. This will ensure that the SoCG is available to help Local Planning Authorities in demonstrating constructive and positive cooperation on strategic matters at local plan examinations.

WHITE PAPER: PLANNING FOR THE FUTURE

20. The government is currently consulting on 'Planning for the Future', a White Paper setting out significant proposed reforms to the planning system, focused on local plans. A summary of the proposals contained in the White Paper that relate to strategic planning and consideration of a possible consultation response is attached at Appendix 2 to this report. Members are requested to provide a steer on whether PfSH should respond to this consultation and if so, what should be included in the response. As there is not another Joint Committee meeting scheduled before the consultation response date of 29th October, it is suggested that agreeing the detailed response would need to be delegated to the Chairman of the PfSH Planning Officers Group (POG), following consultation with the POG.
21. Members may also wish to consider whether there are any other issues raised within the White Paper that are significant for PfSH and would justify a combined response. It would only be appropriate to submit a response to any of the consultation questions if there is consensus amongst the PfSH authorities on the content of the response. The matters most directly related to strategic planning are set out in Appendix 2 to this report, with some commentary; the other questions posed in the consultation document are set out in Appendix 3. The full content of the White Paper is not appended to this report, but members can access it through this [link](#).
22. Should members agree that some of the questions are appropriate for a PfSH response, it is proposed that the POG would meet to discuss and agree the broad content of the responses and in particular establish where there is consensus on the response. These would then be drafted into formal responses which would be finalised and agreed by the Chairman of the POG, following consultation with the Chairman of the PfSH Joint Committee.
23. Any discussion and steer on the possible content of consultation responses provided at this meeting will be reported to the POG. It will be important that members indicate whether any proposals in the White Paper are supported or opposed in principle, so that the POG can then work on appropriate responses. If consensus does not exist on any of the proposed responses,

they would not be appropriate for a PfSH response and it will be left to authorities to make their own individual responses on those matters.

24. The government will need to take account of consultation responses before taking new legislation through the parliamentary process. The outcome of these proposals is uncertain and will require new legislation to become the statutory basis for future local plans. Until there is more certainty, local plans will continue to be prepared in accordance with current legislation and government policy. When the reforms to the planning system are more certain, PfSH can consider how this affects the work under the SoCG and the production of local plans. Government proposals for devolution are expected to be announced in the Autumn and these could also have a significant impact on the context for future strategic planning work.

RECOMMENDATION

It is RECOMMENDED that the Joint Committee: -

- a) APPROVES the content of the Statement of Common Ground, attached at Appendix 1 to this report, that will lead to the production of a PfSH Joint Strategy;
- b) NOTES the summary of the Planning for the Future White Paper, set out at Appendix 2 to this report;
- c) DETERMINES whether PfSH should respond to the consultation and if so, the nature of the response; and
- d) AGREES that the detail of any response be delegated to the Chairman of the PfSH Planning Officers Group, following consultation with the Group and the Chairman of the Joint Committee.

Appendices:

Appendix 1 – Partnership for South Hampshire Statement of Common Ground

Appendix 2 – White Paper: Planning for the Future – summary of proposals in relation to strategic planning and consideration of possible consultation response

Appendix 3 – White Paper: Planning for the Future – consultation questions

Appendix 4 – PfSH Current Local Plan Status

Background Papers:

None

Reference Papers:

[White Paper: Planning for the Future](#)

Draft Framework for PfSH Statement of Common Ground – Report to PfSH Joint Committee 14 October 2019

Statement of Common Ground – Progress – Report to PfSH Joint Committee 10 February 2020

Statement of Common Ground – Progress – Report to PfSH Joint Committee 7 July 2020

Enquiries:

For further information on this report please contact:-

Claire Upton-Brown, Chairman PfSH Planning Officers Group

T: 02380 285588

E: claire.upton-brown@nfdc.gov.uk

Partnership for South Hampshire –Statement of Common Ground

1. Introduction

2. Background

3. Content

a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);

b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

4. Signatories

1. Introduction

- 1.1. The Partnership for South Hampshire (PfSH) – formerly the Partnership for Urban South Hampshire (PUSH) – was originally formed in 2003. It is a partnership of district and unitary authorities, together with a county council and national park authority, working together to support the sustainable economic growth of the South Hampshire sub-region. Whilst the membership has altered slightly over the years, the core membership has remained broadly consistent.
- 1.2. The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. The Partnership was heavily involved in the production of a sub-regional strategy for development that formed part of the South East Plan. This strategy was tested through public examination and when adopted by the Secretary of State, formed part of the development plan at that time, which subsequently informed the production of local plans.
- 1.3. The ethos of collaborative cross boundary working has continued, and the Partnership has a successful track record in providing effective strategies for sub-regional planning. As well as joint working between member authorities, PfSH works with partner agencies in the sub-region as well as key Government departments to deliver joint strategies and pool resources.
- 1.4. Local planning authorities are being required to resolve cross-boundary strategic planning issues through their local plans. Complying with the ‘Duty to Cooperate’ (National Planning Policy Framework (NPPF) para 17) is a fundamental requirement for local plans to successfully be found sound through public examination.
- 1.5. In 2016 the PfSH authorities produced a framework, namely the [PUSH Spatial Position Statement](#), to guide future local plans and housebuilding and development in the sub-region. However, since then the NPPF has been significantly revised, and a standard method for the assessment of housing needs has been issued by the Government. In line with the aim of addressing the national housing crisis, the Government has made clear that strategic policies within development plans should provide for unmet needs in neighbouring authority areas, unless this would contravene specific national planning policies, or these policies taken as a whole. Significantly boosting the supply of housing has been at the centre of all three versions of the NPPF.
- 1.6. PfSH has agreed that there is a need for its constituent authorities to work together to seek to produce a Statement of Common Ground (SoCG) and to explore the production of an Infrastructure Investment Plan. At its meeting on 31 July 2019, PfSH approved the commissioning of a number of evidence work streams to inform the production of a PfSH Joint Strategy. In October 2019 PfSH agreed a draft framework SoCG. This document has been revised and updated to form this initial Statement of Common Ground. It sets out the programme of work that will be undertaken and will be updated as the evidence workstreams progress.

2. Background

- 2.1. In 2016 PUSH published a Spatial Position Statement to help inform Local Plans and assist individual Councils in meeting the Duty to Cooperate. It was developed as a non-statutory document to inform long-term decisions about the level and distribution of development across South Hampshire. The Position Statement resulted in all needs being met to 2026 and the majority of needs being met through to 2034, with the rate of delivery for new homes being increased by approximately 34%.
- 2.2. The Position Statement included a number of spatial principles that underpinned its development, a series of key principles that were applied through the evolution of the spatial approach and a suite of policies that form the spatial approach. These include housing distribution; strategic development locations; distribution of additional employment floorspace; strategic employment locations; waterfront sites of sub-regional significance; retailing and town centres; green infrastructure; strategic countryside gaps; environment; encouraging modal shift; highway improvements; social infrastructure; and utilities infrastructure.
- 2.3. Clearly time has moved on since the production of the Spatial Position Statement and there is a need to review and update it. Standardised assessments of housing need (objectively assessed need) indicate a need to significantly increase housing provision, there is a need to extend the period covered by the Position Statement beyond 2034 and in particular, to address cross-boundary environmental issues such as the impact of development on water and air quality and on protected sites of international nature conservation importance. In planning for major development, it is also important to maintain and enhance a coherent pattern of town and countryside, to protect towns and villages with a distinct identity and appropriate countryside gaps.
- 2.4. In December 2018 PUSH agreed that the rationale and justification for a possible Green Belt designation be included as part of any joint work taken forward under the Duty to Cooperate initiative. Potential Green Belt designation should be considered alongside the role for green infrastructure, both to serve recreational needs of residents and provide environmental mitigation and enhancement, especially for likely adverse impacts on the integrity of European Nature Conservation sites. In particular, cross-boundary (e.g. catchment-wide) mitigation measures may need land to be allocated to deal with recreation pressures and water and air quality issues, depending on the results of the Habitat Regulations Assessment and Appropriate Assessment. This could also help meet some of the policy aims around climate change (a number of local authorities have declared climate emergencies) and health and wellbeing.
- 2.5. Government policy has also evolved and some strategic issues to be addressed through planning policies, particularly through the location and form of development, have gained greater priority. Issues such as climate change, health and wellbeing, biodiversity and natural capital and environmental net gain have all increased in prominence within public consciousness. All of these issues will affect the location and design of new development in the future.
- 2.6. National planning policy provided through the latest NPPF, published in February 2019, makes it clear that Local Plans should contain strategic policies that, as a

minimum, meet their own needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (para 11).

2.7. The NPPF (para 20) states that,

'Strategic policies should set out the overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing, employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'*

2.8. Whilst the application of the standard method for assessing local housing need is now established in the NPPF (para 60), the sub-regional need for other forms of development and the opportunities to meet those needs are still to be established. This Statement of Common Ground sets out the workstreams for which PFSH will commission evidence to help lead towards the review of the Spatial Position Statement and the production of a Joint Strategy. The four workstreams are:

- Strategic Development Opportunity Area (SDOA) assessments (including traffic modelling and transport impact assessments for the SDOAs)
- Economic, Employment & Commercial Needs (including logistics) Study
- Joint Strategy Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and Appropriate Assessment (AA)
- Green Infrastructure Needs and Consideration of Mechanisms on How to Achieve Green Belt Designation.

2.9. The SoCG has been prepared against the headings set out in national planning practice guidance (Paragraph: 011 Reference ID: 61-011-20190315).

2.10. It should be noted that the SoCG is intended to deal with strategic cross-boundary matters at a sub-regional scale and it does not negate or supersede any existing SoCG either between the PFSH and individual authorities or between individual authorities.

2.11. The Joint Strategy will again be a non-statutory high-level strategic plan which can inform Local Plans and assist the Local Planning Authorities in meeting the Duty to Cooperate.

3. Content

a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s)

3.1. The PfSH area has changed over the years, although the core membership, including the County Council and unitary authorities, has remained constant. The Partnership for Urban South Hampshire was formed in 2003 and evidence secured to inform preparation of the South East Plan helped to establish it as an appropriate sub-region for the purpose of strategic planning.

3.2. The following local authority areas are fully within the PfSH boundary:

- Eastleigh Borough Council
- Fareham Borough Council
- Gosport Borough Council
- Havant Borough Council
- New Forest District Council
- Portsmouth City Council
- Southampton City Council

3.3. The following local authority areas are partly within the PfSH boundary:

- East Hampshire District Council
- Hampshire County Council
- New Forest National Park Authority⁴
- Test Valley Borough Council⁵
- Winchester City Council

The SoCG will include the whole of the New Forest District Council, Test Valley Borough Council and the New Forest National Park Authority area (within Hampshire).

3.4. PfSH is a mature partnership with a lengthy track record of cooperation and collaboration on strategic planning issues and can work with flexible boundaries where necessary (e.g. Bird Aware Solent). PfSH has continued to secure evidence and propose solutions to meeting the need for development and investment in infrastructure.

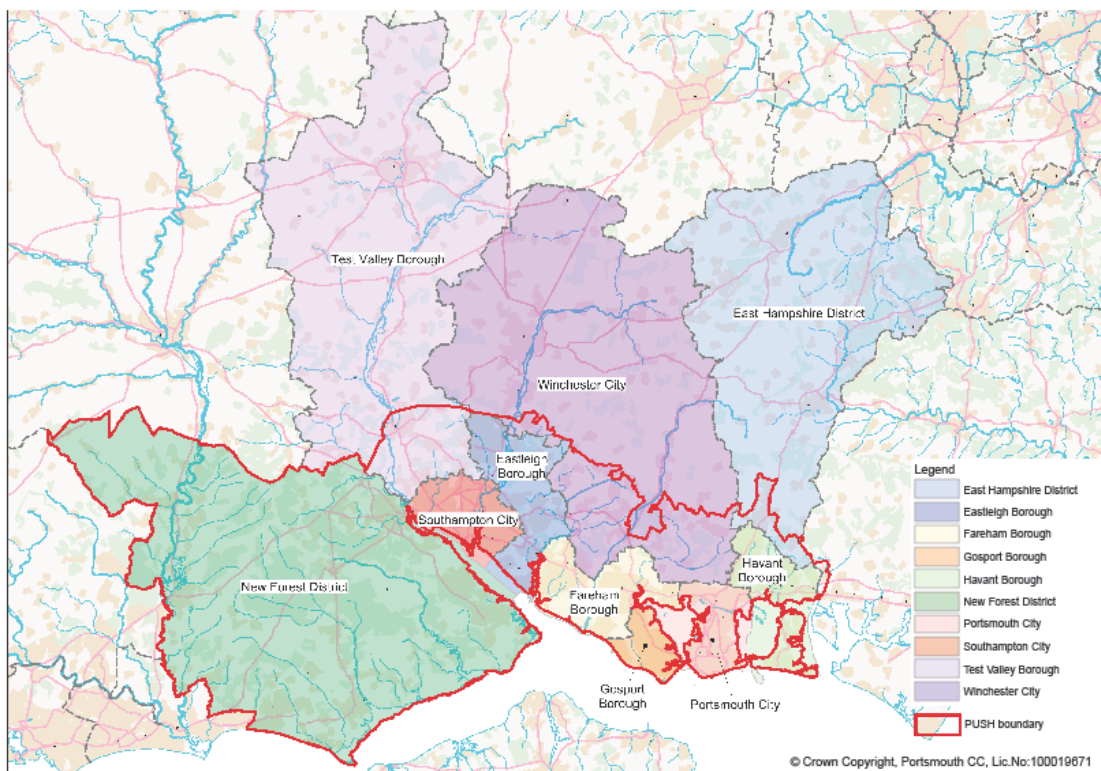
3.5. The evidence base collated over recent years supports the definition of the South Hampshire sub-region for strategic planning purposes, whether it relates to the two closely linked housing markets around Portsmouth and Southampton, the functional economic market area across the whole sub-region or the physical geography of an area located between the South Downs and New Forest National Parks and the coast with islands and peninsulas interspersed with harbours and rivers.

⁴ The New Forest National Park Authority is not a local authority but is a local planning authority with plan-making responsibilities. A small part of the New Forest National Park is in Wiltshire.

⁵ Please note that whilst only part of Test Valley Borough Council area falls within the PfSH boundary, the evidence base studies referenced in this report will cover the whole Borough, unless the Council determines otherwise.

3.6. There is common agreement amongst partner authorities that the PfSH area is an appropriate geography on which to prepare a Joint Strategy to deal with cross-boundary strategic planning matters and support the production of local plans. An extensive evidence base has identified the housing market areas and the need to plan at the South Hampshire scale has previously been considered. Significant information is included within the 2014 GL Hearn [Strategic Housing Market Assessment](#) and previous evidence base work related to the physical environment has demonstrated the synergies for collaborative planning in South Hampshire. It is not intended to revisit the definition of the sub-region as part of the work identified in this SoCG. However, it is acknowledged that there will be some strategic issues that need to be considered in the context of a wider geographical area than that within the PfSH boundary.

3.7. The map below shows the extent of the Partnership for South Hampshire.



b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.

3.8. Regard has been had to advice in the NPPF in defining the strategic matters to be addressed as set out below:

- Housing need
- Employment land
- Infrastructure investment
- Biodiversity net gain, environmental enhancement and avoidance and mitigation of environmental impacts
 - This strategic matter will consider climate change and health and wellbeing and include the need for sub-regional green infrastructure and strategic habitat mitigation and consideration of potential green belt designation.

3.9. The housing needs for each local authority area are calculated using the government's standard method for assessing local housing need and are set out in Table 2 below. The identified objectively assessed housing need is accepted as the correct level to test and to plan for strategically in accordance with government policy, to inform housing targets to be set in local plans. PfSH will address the issue of unmet housing need through the Joint Strategy as set out later in this SoCG.

3.10. The latest need for employment land is less well established. To inform the need for employment land allocations in local plans, PfSH has commissioned an evidence base study: The Economic, Employment and Commercial Needs (including logistics) Study. This Study will provide quantitative evidence of the need for employment land as well as qualitative evidence on specific sectors and their land and locational requirements and commercial realism. When this Study has been completed, this SoCG can be updated to include information on the need for and supply of employment land. Options to address any unmet need will be considered alongside the options to meet housing needs as part of the formulation of the Joint Strategy. Of critical importance to the consideration of these options will be the alignment with and ability to help deliver the strategies that are being prepared by the Solent and Enterprise M3 Local Enterprise Partnerships (LEPs).

3.11. The rate of economic growth that is assumed within the Study will have a significant impact on the resultant land requirements. The Solent LEP's 2050 Strategy and the Enterprise M3 LEP's Local Industrial Strategy were due to be completed in early 2020, although it is understood that they will not include proposed economic growth rates to be planned for. Should the LEPs' strategies be made available during 2020 they should be able to inform the Study. It is recognised that ambitions related to the achievement of enhanced levels of economic development within the sub-region will also have an impact on future housing requirements within the area, and may require the area to accommodate higher levels of housing growth than indicated by the standard method for assessing local housing need. Work to understand the housing need that may be generated by the expansion of the Port of Southampton forms part of the Study.

- 3.12. Infrastructure investment is a major priority for PfSH, both in terms of identifying the infrastructure needed to deliver development that represents ‘good planning’ and working together to secure investment in the sub-region. PfSH authorities and the Solent LEP have a good track record in successfully obtaining funding and investment for South Hampshire. The Hampshire and Isle of Wight Planning Officers Group (HIPOG) is commissioning a county-wide study which will focus on infrastructure but will also encompass natural environmental capacity issues. This piece of work will map environmental and infrastructure opportunities and provide a strategic framework and high-level vision to assist in the identification and planning of future infrastructure and growth options that will come out of the PfSH work which will then inform where infrastructure investment is needed. Hampshire County Council has subsequently determined that in order to inform any Hampshire-wide strategy documents, it is necessary to produce a series of documents that examine the state of: The Natural Environment; Economy; Society; and The Built Environment and Infrastructure. These follow on from the findings and recommendations of the Hampshire 2050 Commission of Inquiry, which concluded in September 2019. These documents are expected to be completed this year.
- 3.13. A long standing and continued objective of PfSH is to focus development within the major urban areas, cities and towns first. Our cities and towns form the economic and social heart of South Hampshire. Focussing major development in these locations will enhance economic synergies, the vibrancy of places, support regeneration, social inclusion and the effective use of existing infrastructure, focus people close to jobs, services and public transport (reducing our need to travel more by car), and protect more of our countryside. It is important to recognise that our need for homes and jobs will need new development and infrastructure in a range of locations both within and around our towns and villages, and a balanced investment strategy is needed to deliver development in our cities, towns, villages and new areas of growth.
- 3.14. PfSH has a strong track record in providing strategic environmental mitigation. As part of the formulation of the South East Plan it was identified that new development could lead to increased recreational pressure on the coast with the resultant disturbance of birds. As this could have had a negative impact on a statutorily protected habitat, PfSH led on the development of a strategic scheme of mitigation and then subsequently its implementation. This Solent Recreation Mitigation Strategy has now been branded as ‘Bird Aware Solent’ and has enabled residential development to continue whilst protecting the natural environment from harm. PfSH continues to carry out a governance role in setting budgets, approving the business plan, monitoring the strategy and determining the funding of infrastructure improvements from developer contributions. The scope and extent of the Bird Aware Solent Strategy will need to be reviewed as part of the Habitat Regulations Assessment of the new Joint Strategy, as it currently deals with development to 2034, as identified in the Spatial Position Statement (2016).
- 3.15. Similar recreational disturbance issues affect protected species in the international nature conservation sites within the New Forest National Park. Development currently contributes to various mitigation schemes prepared by

individual planning authorities, albeit that this only applies to some planning authorities in the west of the sub-region. There is a need for a co-ordinated and strategic approach to addressing the impact of development on the New Forest arising from growth in part of the PfSH area. A partnership⁶ has commissioned a new study of visitors to the New Forest's Natura 2000 sites. This research provides updated information⁷ on visitor activity and the evidence base for the preparation of a new co-ordinated approach to addressing recreational pressures on the New Forest through appropriate planning and mitigation measures.

3.16. South Hampshire continues to face pressing new challenges over the potential impact of development on the environment. Climate change is a significant global issue affecting new development and impacting on existing settlements and a number of local authorities have declared climate emergencies. There is a need to ensure that development is planned in a way that minimises carbon emissions that cause climate change and that new development, so far as is possible, is not vulnerable to the impacts of climate change. This overarching theme will be of great significance when considering the options for further development in the Joint Strategy and is of particular relevance to the UK's commitment to net zero carbon emissions by 2050. PfSH will ensure through the approach in the Joint Strategy that the policy framework enables the creation of strong and resilient communities able to withstand the effects of climate change.

3.17. In addition to the existing prioritisation given to policies and proposals to address climate change, the Coronavirus pandemic has caused many to consider how the economic recovery should be focused on a 'green' recovery. This should ensure that planning for economic growth does not simply assume that it will carry on as before without considering the implications of the pandemic. There is an opportunity to tackle deeply ingrained economic, environmental and social challenges, from climate change and inequality, to the sub-region's physical and mental health. PfSH proposes to lead on developing a 'Greenprint for South Hampshire' that will provide a shared framework to enable authorities to work together to design and implement programmes that achieve economic, environmental and social improvements, building on existing actions across the sub-region to reshape the economy to be in harmony with the world class environment and which helps communities to thrive. Whilst at an early stage, it is likely that there will be spatial implications that will need to be addressed in the new Joint Strategy. As work on the Greenprint develops, additional detail can be included in future iterations of the SoCG.

3.18. Emissions from transport (and particularly the private car) are a significant causal factor of climate change and poor air quality locally and are influenced through the location of new development. PfSH has commissioned an [Air Quality Impact Assessment](#) and acknowledges that air quality is a strategic issue that needs continued collaborative working amongst PfSH authorities⁸. The Air Quality Impact Assessment provides a strategic baseline for the purpose of

⁶ Test Valley Borough Council, New Forest District Council, New Forest National Park Authority, Southampton City Council, Eastleigh Borough Council, Wiltshire Council, Natural England

⁷ Reports published to date can be accessed [here](#).

⁸ N.b. There is a separate [Air Quality Study](#) for the New Forest to 2036 that also flags up issues including potential impacts on New Forest habitats.

informing planning policies but will need updating in due course as it currently only deals with development planned to 2034 in the Spatial Position Statement (2016).

3.19. One of the most significant current risks facing new development relates to the impact of nutrient deposition (nitrates and phosphates) on protected habitats, albeit agricultural sources are the most significant cause. New dwellings add to this issue through an increase in foul wastewater that needs to be treated in sewage treatment works, and in surface water run-off, that drain to the Solent. Whilst this is a serious short-term issue that will likely require immediate measures, longer term arrangements will need to be put in place to ensure that the risk is mitigated, and development can continue. Long term solutions are likely to require significant investment, for example in removing sources of nitrogen deposition unrelated to wastewater treatment (e.g. taking land out of intensive agricultural production) or by providing enhanced treatment at sewage works. PfSH is committed to working with central government agencies to find an efficient, central solution.

3.20. PfSH has formed a Water Quality Working Group to coordinate a PfSH-wide response to addressing the medium to long-term strategy (which could build upon an initial pilot scheme). Individual Local Planning Authorities are also progressing their own interim solutions in the short-term. The Group also includes local authorities from beyond the PfSH boundary that need to address this issue. At its meeting in July 2020 the PfSH Joint Committee endorsed:

- The establishment of a dedicated officer resource as a temporary planning officer post to work on the nutrient neutrality issue, and take forward a pilot sub-regional mitigation scheme;
- Continued investigation into determining a sub-regional mitigation scheme, including working towards a Solent Nutrient Fund; and
- PfSH's continued work with wider local authority partners beyond PfSH members in addressing the nutrient neutrality issue, including on potential funding.

3.21. Whilst ensuring that we plan for the new development we need, it is important for the successful delivery of that development that we do this whilst protecting a coherent pattern of town and countryside. This will ensure the best countryside is protected by ensuring that the setting of towns and villages with distinct identities are protected by appropriate countryside gaps; and that the areas with most productive agricultural land, highest landscape value and greatest recreational or ecological benefit are protected and enhanced. Careful choices will need to be made to ensure that we do plan for and deliver the homes, jobs and infrastructure that we all need whilst protecting and enhancing a coherent pattern of town and countryside which maintains and enhances our quality of life. The workstream on '*Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation*' will relate to these broader objectives.

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory)

3.22. The authorities responsible for the joint working detailed in this SoCG are:

- East Hampshire District Council
- Eastleigh Borough Council
- Fareham Borough Council
- Gosport Borough Council
- Hampshire County Council
- Havant Borough Council
- New Forest District Council
- New Forest National Park Authority
- Portsmouth City Council
- Southampton City Council
- Test Valley Borough Council
- Winchester City Council

3.23. In addition, the joint working will be undertaken in conjunction with:

- Enterprise M3 LEP
- Environment Agency
- Hampshire and Isle of Wight Local Nature Partnership
- Highways England
- Homes England
- Natural England
- Solent LEP
- Solent Transport

At this stage it is not anticipated that these organisations would be formal signatories to the SoCG. Other key infrastructure providers will also be involved, for example public transport providers and water companies.

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date

- 3.24. PfSH has long established governance arrangements, the full details of which are on the [website](#). The PfSH Joint Committee members are the leaders or cabinet members of the constituent local authorities, supported by chief executives. The Solent LEP, Environment Agency and Homes England are represented on the Committee as observers and Natural England regularly attends the meetings.
- 3.25. Alongside the Joint Committee, an Overview and Scrutiny Committee has been established to complement and, where necessary, make recommendations to the Joint Committee with regards to PfSH business. The Committee comprises a nominated councillor and chief executive from each of the PfSH authorities.
- 3.26. The technical work that will be undertaken to lead to the new Joint Strategy will be overseen by the PfSH Planning Officers Group, a working group of planning officers from each of the partner authorities, including the county council, together with Solent Transport, Natural England and the Environment Agency. PfSH has appointed a consultant Project Manager to coordinate the work on behalf of the Planning Officers Group.
- 3.27. The PfSH Joint Committee will make decisions on strategic planning matters referenced in this SoCG, based on officer recommendations. Each Council will decide how to use its own decision-making mechanisms to consider its own approach to the decisions being made at the PfSH Joint Committee.
- 3.28. This SoCG sets out the process and workstreams that will lead to the review of the Spatial Position Statement and the production of a new Joint Strategy. As the evidence base progresses, it will be appropriate to produce further iterations of the SoCG to reflect the progress made and consider the next steps. A timetable for the anticipated progress of the evidence workstreams and the production of the Joint Strategy is included in Table 1 below. PfSH will remain adaptable to changes in the work programme depending on the results of the studies. Particular regard will be had to the need to support Local Planning Authorities through the need to demonstrate compliance with the Duty to Cooperate and national planning policy at their local plan examinations when considering the timing of future iterations of the SoCG.

Table 1 SoCG timetable

	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022	Q2 2022	Q3 2022
SDOA assessments⁹								
Identify SDOAs and scope assessments/transport commission¹⁰								
Procure consultants for SDOA assessments								
Undertake assessments	X	X	X	X				
Procure transport consultants								
Undertake modelling & TIAs ¹¹	X	X	X	X				
Finalise report				X				
Final report presented to Joint Committee					X			
Economic, employment and commercial needs (including logistic) study								
Identify existing evidence and scope of study								
Procure consultants								
Undertake study	X							
Final report presented to Joint Committee		X						
Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation								
Establish green infrastructure needs through SDOA assessments (SA/HRA)				X				
Consider options for policy approach scope and procure landscape assessment					X			
Undertake assessments and further consider options						X	X	
Review evidence and determine approach to green belt designation								X

⁹ This workstream incorporates Sustainability Appraisal and Habitat Regulations Assessment of the potential Strategic Development Opportunity Areas.

¹⁰ Struck through text indicates that the stage is complete.

¹¹ Transport Impact Assessments

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement

3.29. The assessed housing need using the standard method (as required by government policy) for the local authority areas within the PfSH area is set out in the table below¹²:

Table 2 Housing need 2020 – 36

Local Authority	Standard Method 2020 – 2036 (dpa) ¹³	Proposed Standard Method 2020 – 2036 (dpa) ¹⁴	Total requirement 2020 – 2036
East Hants (part)	112		1,792
Eastleigh	694	885	11,104
Fareham	514	403	8,224
Gosport	344	309	5,504
Havant	504	963	8,064
New Forest ¹⁵	785	782	12,560
Portsmouth	854	730	13,664
Southampton	1,002	832	16,032
Test Valley (part) ¹⁶	181		2,896
Winchester (part)	235		3,760
Total	5,217		83,600

3.30. There is no centrally produced figure using the government's standard method, and the above table has been compiled using the best figures available. Figures for districts which only partly fall within PfSH have been apportioned on the basis of the population of those wards which fall within PfSH, other than Test Valley as referenced in the table. All figures have been provided by the local planning authorities and represent their most up to date understanding of the application of the standard method on a consistent basis. It should also be noted

¹² N.b. this relates to the current standard method and not the proposals that were published for consultation in August 2020.

¹³ Dwellings per annum.

¹⁴ The figures quoted in this column relate to the government consultation on the revised standard method and have been taken from the analysis published on the [Lichfields website](#) and have not been produced by the PfSH Local Planning Authorities. The 'split' districts have not been included as there is no breakdown from whole local authority areas in the Lichfields analysis.

¹⁵ This figure covers the whole of New Forest District, including the part of the New Forest National Park within the district, and is covered by separate local plans prepared by NFDC & NFNPA.

¹⁶ This figure is derived from the TVBC Local Plan. Previous estimates have used population splits based on ward boundaries, although the ward boundaries are not contiguous with the PfSH boundary. The Local Plan splits the housing market in the borough between north and south and assumes a 33% population split in the southern housing market area.

that the figures are updated periodically as new sub-national population projections and affordability ratios are published¹⁷.

- 3.31. The annual housing need figures in Table 2 can be multiplied by the number of years being planned for to give the total housing requirement. This means that the total housing requirement for the PfSH area between 2020 and 2036 is for some 84,000 homes¹⁸.
- 3.32. For the period to 2036, there is a significant amount of supply already identified through planning permissions, other urban¹⁹ sites (either windfall or sites identified in strategic housing land availability assessments (SHLAAs²⁰)) and allocations in adopted local plans and made neighbourhood plans. Further allocations are currently proposed in the Havant Local Plan Review which the Council expects to submit for examination in the near future. Fareham Borough Council is due to consider its Regulation 19²¹ pre-submission Local Plan shortly for approval to consult this autumn before submission for examination, and it is anticipated that this will contain a small number of allocations that will further increase the identified supply.
- 3.33. The New Forest National Park Local Plan 2016 – 2036 was formally adopted on 29 August 2019 and makes provision for an additional 800 dwellings in the National Park over the Plan-period. The New Forest District Local Plan was formally adopted on the 6th July 2020 and makes provision for an additional 10,420 dwellings in the part of the District outside of the National Park over the plan period.
- 3.34. Havant and Eastleigh Councils have made significant allocations for development in their emerging local plans and whilst still subject to the outcome of their examinations, these have reached a sufficiently advanced stage in the plan-making process to be considered as commitments from the Council concerned for the purpose of calculating the remaining housing needs to be planned for. In the case of the Eastleigh Local Plan, the Inspector's post hearing advice letter already provides a clear indication of the outcome in terms of housing supply, and Eastleigh's assumed commitments have been adjusted to fully reflect this. This SoCG will continue to be updated to reflect progress in local plans from Regulation 19 consultation through to adoption, with consequential adjustments to the housing supply figures.
- 3.35. The housing supply position has been calculated by adding commitments in the form of planning permissions²², SHLAA sites²³ and local plan allocations

¹⁷ Government policy requires the use of the 2014-based household projections. Revised affordability ratios are published every two years.

¹⁸ Local plans within the sub-region can be prepared at different times and may not use a 2016 base, particularly as housing need information is updated.

¹⁹ With the exception of the New Forest – see footnote 19 below.

²⁰ SHLAAs may also be referred to as SLAAs (Strategic Land Availability Assessments), HELAAs (housing and economic land availability assessments) or SHELAAs (strategic housing and economic land availability assessments)

²¹ Town and Country Planning (Local Planning) (England) Regulations (2012)

²² These may include C2 units with the ratio in the Housing Delivery Test Measurement Rule Book applied to give the C3 equivalent.

(adopted plans and the emerging Eastleigh and Havant plans) and a windfall estimate (predominantly or wholly urban sites). It is recognised that other local planning authorities are currently identifying additional sites for their areas as part of their emerging local plans and consequently the housing supply figures will increase.

3.36. The identified housing provision for the local planning authority areas within the PfSH area is set out in Table 3 Housing Supply 2020 – 2036 below:

Table 3 Housing Supply 2020 – 36

Local Planning Authority	Total provision 2020 ²⁴ – 36
East Hants (part)	1,169
Eastleigh (including proposed allocations)	8,335
Fareham ²⁵	6,550
Gosport	2,919
Havant (including proposed allocations)	8,822
New Forest (outside national park)	9,347
New Forest National Park	688
Portsmouth	12,995
Southampton	12,904
Test Valley (part)	3,135
Winchester (part)	5,986
Total	72,850

3.37. As can be seen by comparing the assessed housing need to 2036 with the currently identified supply there is a shortfall of some 11,000 homes that needs to be addressed through the work identified in this SoCG. It is important to stress that this gap is split across the Portsmouth and Southampton housing market areas, the housing gap in the two individual areas will be considerably smaller, although it still needs to be addressed. As work progresses through the evidence base leading to the Joint Strategy, and further progress is made with local plans, it is intended that this table is updated to reflect any changes in provision. To further aid the understanding of the geographical distribution of housing need and current supply, the tables are combined below:

Table 4 Comparison of housing need and supply 2020 – 2036

Local Authority	Annual Housing Need	Total housing need 2020 –	Supply = Commitments,	Shortfall/ surplus
-----------------	---------------------	---------------------------	-----------------------	--------------------

²³ SHLAA sites are included when they form part of the LPA housing land supply and are within existing settlement boundaries. SHLAA sites for New Forest District outside of settlement boundaries are also included as this source of supply has been tested through the examination of the Part 1 Local Plan and was found sound. Allocations will subsequently be made in their Part 2 Local Plan.

²⁴ Base date is 1st April 2020.

²⁵ Includes sites with a resolution to grant planning permission.

	using Standard Method (dpa)	2036	local plan allocations + windfall estimate	
East Hants (part)	112	1,792	1,169	-623
Eastleigh	694	11,104	8,335	-2,769
Fareham	514	8,224	6,550 ²⁶	-1,674
Gosport	344	5,504	2,919	-2,585
Havant	504	8,064	8,822	+758
New Forest	785	12,560	10,035	-2,525
Portsmouth	854	13,664	12,995	-669
Southampton	1,002	16,032	12,904	-3,128
Test Valley (part)	181	2,896	3,135	+239
Winchester (part)	235	3,760	5,986	+2,226
Total	5,225	83,600	72,850	-10,750

²⁶ Includes sites with a resolution to grant planning permission.

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

3.38. The majority of needs for housing and employment development up to 2036 are already planned to be met through existing planning permissions, allocations in local plans and neighbourhood plans and small-scale windfall development. However, there remain unmet housing and potentially employment needs which are not currently planned for across local authority areas and a strategic approach is needed to determine the most sustainable locations to accommodate this development within the sub-region.

3.39. PfSH has agreed a programme of work to review the Spatial Position Statement, leading to a new Joint Strategy. Four workstreams are set out below:

- Strategic Development Opportunity Area (SDOA) assessments (including traffic modelling and transport impact assessments for the SDOAs)
- Economic, Employment & Commercial Needs (including logistics) Study
- Joint Strategy Strategic Environmental Assessment, Sustainability Appraisal, Habitats Regulations Assessment and Appropriate Assessment
- Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation.

3.40. The Spatial Position Statement (2016) includes Strategic Development Locations. The review of this document and the need to plan where further strategic growth will take place means the identification of further Strategic Development Opportunity Areas (SDOAs) is required. Some of these areas are already being identified through adopted or emerging local plans, e.g. Mayflower Quarter (Southampton) and Southleigh (Havant). These sites are already included in the housing supply figures in Table 3. Whilst these major proposed allocations make significant contributions to accommodating housing needs, further SDOAs will inevitably be needed alongside smaller brownfield and greenfield developments.

3.41. The PfSH Planning Officers Group has agreed a process to identify potential SDOAs for further assessment. This involved the identification of all sites above a threshold²⁷ that have been previously promoted or considered as reasonable alternatives as part of local and strategic planning processes. Consultants have been appointed to identify any further options and potential choices for land to accommodate strategic development and then these potential SDOAs will be subject to analysis and appraisal to establish the most sustainable options and the infrastructure investment needed to deliver them.

3.42. The assessment of the SDOAs is following the process below:

- Identification of potential SDOAs

²⁷ 20 hectares or 500 dwellings. A number of smaller sites in the same general location could potentially be combined to form a larger strategic site above the threshold.

- Detailed assessments of potential SDOAs including:
 - constraint mapping and sustainability appraisal
 - habitat regulations assessment (including appropriate assessment)
 - transport modelling and transport impact assessments (commissioned as a separate study)
 - landscape impact / green infrastructure
 - strategic infrastructure requirements or opportunities.

3.43. PfSH has commissioned consultants to prepare the assessments and undertake the sustainability appraisal and habitat regulations assessment/appropriate assessment. The transport modelling and transport impact assessments are the subject of a separate commission and will be undertaken in conjunction with Solent Transport and its member organisations. The PfSH Planning Officers Group will then consider the results of the assessments before making recommendations to the Joint Committee as to the SDOAs to include in the Joint Strategy. The sustainability appraisal will be key to making these recommendations.

3.44. Whilst there is clear government policy on the method to be used to assess housing needs, a less prescriptive national policy applies to establishing the need for employment development, although there is the same requirement to meet those needs through plan-making. In order to establish the amount and type of land that needs to be allocated, as well as examining the existing supply, PfSH has commissioned consultants to produce an Economic, Employment and Commercial Needs (including logistics) Study. The results of this study will be considered alongside the SDOA assessments when considering the need for land allocation.

3.45. There are clear benefits in planning for a mix of uses when planning for new communities. There are also opportunities within the existing urban areas for significant redevelopment. The identification of Strategic Development Opportunity Areas will potentially include urban and greenfield sites, expanding upon those identified as Strategic Development Locations in the Spatial Position Statement.

3.46. The need to mitigate potential adverse impacts of new development on the environment is apparent through the evidence base from previous local plans and current issues relating to water and air quality and recreational pressure and potential harm to protected habitats. It is a major priority for the PfSH authorities to ensure that the natural environment is not diminished through new development and where possible, is enhanced. Furthermore, government policy now requires development to provide a net gain for biodiversity. Given the sub-region's location between two National Parks (the South Downs and the New Forest), the 'duty of regard' set out in Section 62(2) of the Environment Act 1995 is also relevant. This duty ensures that any decisions that could affect National Parks must have regard to the two statutory Park purposes.

3.47. There are legal requirements for carrying out strategic environmental assessment (incorporated within sustainability appraisal) and habitat regulations assessments (including appropriate assessments) when considering the location

of new development. Given issues around recreational disturbance and the potential need to mitigate the impact of nutrient deposition from wastewater outputs and traffic emissions as a result of additional dwellings, there will be a requirement to allocate land to provide sustainable alternative natural greenspace and to reduce nitrate levels in the water environment. Consideration will need to be given to incorporating accessible natural green spaces within SDOAs to ensure that they are accessible to residents and assist with the delivery of appropriate environmental mitigation.

- 3.48. Climate change is an overarching theme that will be at the forefront of the strategy for new development. Matters such as flood risk and policy approaches to resilience can be explored through the sustainability appraisal and SDOA assessments. Any opportunities to reduce potential environmental impact through the location of development will be considered alongside mitigation measures that need to be addressed through planning policy.
- 3.49. The current Strategic Flood Risk Assessment (SFRA) for the PFSH area was completed in 2007, with subsequent interim updates and reviews in 2012 and 2016. PFSH is therefore commissioning a new level one SFRA for the majority of the PFSH region (not East Hampshire, which is in the process of completing an SFRA for its planning area), along with the whole local planning authority areas of Test Valley and Winchester. This is to take account changes in legislation and policy, as well as emerging updates to evidence, modelling and mapping of flood risk. The new SFRA is expected to be completed in 2021.
- 3.50. Dealing with climate change issues can have a long-term beneficial impact on the health and wellbeing of the new communities now being planned. Other issues, such as access to green spaces and opportunities for active travel can also be addressed through the strategy for new development.
- 3.51. Impacts on health caused by poor air quality will be considered through the sustainability appraisal. Development should be located so as to minimise adding to air quality problems and regard should be had to designated Air Quality Management Areas when determining strategic approaches to development.
- 3.52. The strategy will meet development needs, informed by the sustainability appraisal of SDOAs, which will take account of all relevant factors as set out above, of which green infrastructure is one. The '*Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation*' workstream will commence as the draft results of the SDOA assessments become available. This will enable consideration of potential Green Belt designation to take place in the light of evidence as to development requirements and the most sustainable options for development in South Hampshire based on all relevant factors. It will also enable the green infrastructure needs of potential SDOAs to form part of the consideration of the justification for Green Belt designation. The policy approach to Green Belt designation, if appropriate, can then be included in the Joint Strategy where, along with other policies, it will be subject to sustainability appraisal. Any proposals for formal Green Belt designation would then need to be pursued through individual local plans.

3.53. PfSH intends that the review of the Spatial Position Statement will lead to a new Joint Strategy. Whilst the initial workstreams have been agreed and this work has commenced, further work remains to be undertaken to establish the full scope for the Joint Strategy. A timetable for the evidence workstreams is included in Table 1 at para 3.27 above. A detailed project plan has been prepared for the workstreams set out in this SoCG. As the evidence base nears completion further consideration will be given to the timing and scope for the production of the Joint Strategy.

3.54. The technical work outlined above will enable the preparation of a PfSH Infrastructure Delivery Plan which will be both evidence based and aligned to an agreed distribution of development to meet the need for homes and jobs. This will provide a strong statement to Government of our strategic infrastructure 'asks', in order to deliver development. This will include for example transport, flood risk management, water and environmental infrastructure.

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these

3.55. PfSH published a Spatial Position Statement in 2016. This SoCG sets out the process to update and replace that document and is agreed by the PfSH authorities. It is anticipated that the new Joint Strategy will set out the distribution of housing and employment provision between the respective Local Planning Authorities, particularly with respect to providing for unmet needs, amongst other strategic spatial policies (including the sub-regional approach to potential Green Belt designation).

3.56. PfSH Joint Committee agreed SoCG with Eastleigh and Havant in July 2019.

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the

statement relates to any other statement of common ground covering all or part of the same area

- 3.57. The SoCG sets out a process by which the PfSH authorities will review and update the Spatial Position Statement (2016). It is not intended to replace or supersede any existing SoCG that exists between PfSH and individual local planning authorities or bilateral agreements between local planning authorities.
- 3.58. There are no other strategic matters to be addressed by the SoCG that have not been referenced earlier in the SoCG.

Signatories

Ken Moon
East Hampshire District Council

Keith House
Leader Eastleigh Borough Council

Seán Woodward
Leader Fareham Borough Council

Stephen Philpott
Chairman of Economic Development Board Gosport Borough Council

Judith Grajewski
Executive Member for Public Health Hampshire County Council

Michael Wilson
Leader Havant Borough Council

Edward Heron
Deputy Leader New Forest District Council

Chairman New Forest National Park Authority

Gerald Vernon-Jackson
Leader Portsmouth City Council

Christopher Hammond
Leader Southampton City Council

Nick Adams-King
Deputy Leader Test Valley Borough Council

Neil Cutler
Deputy Leader Winchester City Council

White Paper: Planning for the Future

Summary of proposals in relation to strategic planning and consideration of possible consultation response

1. Introduction

- 1.1. The government published the [White Paper: Planning for the Future](#) in August. This is a consultation on major proposals to reform the planning system and, if implemented, would arguably represent the most significant changes to the planning system since its inception in 1947. At the same time the government has also initiated a consultation on proposed changes to the standard method for calculating local housing need, although this does not yet adjust for land constraints, including Green Belt.
- 1.2. This paper summarises the main proposed changes to the planning system, as they relate to the strategic planning work PfSH undertakes. Perhaps the most notable change is the proposed abolition of the 'Duty to Cooperate' in relation to the production of local plans, the implications of which are discussed in detail below. The change from a standard method for calculating housing need to a standard method for establishing a binding housing requirement is a significant change and consideration needs to be linked to absence of any strategic planning proposals.

2. Duty to Cooperate

- 2.1. Paragraph 1.16 of the White Paper sets out proposals to streamline the planning process. Amongst a series of other proposals, the 4th bullet point states,

'Local Plans should be subject to a single statutory "sustainable development" test, and unnecessary assessments and requirements that cause delay and challenge in the current system should be abolished. This would mean replacing the existing tests of soundness, updating requirements for assessments (including on the environment and viability) and abolishing the Duty to Cooperate.'

- 2.2. Paragraph 14 offer little further explanation,

'the Duty to Cooperate test would be removed (although further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges)'

- 2.3. It is notable that the reference to 'major infrastructure or strategic sites' does not include any consideration of an appropriate distribution of development to meet needs, taking account of constraints, opportunities or how to make development more sustainable at the sub-regional level. Whilst the Duty to Cooperate is generally regarded as not delivering effective strategic planning, its absence would be likely to mean that other proposals within the White Paper and

achieving the government's target of 300,000 homes per annum would prove undeliverable.

- 2.4. Paragraph 1.20 sets out proposals to ensure more land is available for the homes and development people and communities need. Of particular note is the first bullet point which states,

'A new nationally-determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans. This would be focused on areas where affordability pressure is highest to stop land supply being a barrier to enough homes being built. We propose that this would factor in land constraints, including the Green Belt, and would be consistent with our aspirations of creating a housing market that is capable of delivering 300,000 homes annually, and one million homes over this Parliament.'

- 2.5. The most significant element in this proposal is that the new nationally determined housing requirement would be binding and is a change from a standard method to calculate housing need to a standard method to provide the housing requirement for a local plan. Unlike the previous system which recognised that some authorities would not be able to meet their needs and that they would need strategic cooperation with neighbouring authorities, there is no similar process put forward in the current White Paper. There is no information as to how the government would factor in land constraints and this does not form part of the consultation proposals on the revised standard method. It is a significant concern that any formula or algorithm that government adopts would have sufficient subtlety or accuracy to take account of local circumstances (land constraints or brownfield opportunities) that could be applied nationally and still be capable of delivery at the local planning authority level.
- 2.6. It is also a concern that constraints will reduce a housing requirement figure in some areas. Whilst it might not be possible to meet need in a particular location, it appears as though for some constraints this will result in an arbitrary uplift to housing requirements in other areas without any clear relationship with where the housing need is. Devolution proposals may be relevant to this point as very large unitary authorities that encompass urban and rural areas could potentially overcome the difficulty of meeting a binding requirement.

3. Standard Method for Establishing Housing Requirement Figures

- 3.1. The White Paper is more expansive on proposals to replace the standard method for calculating housing need with a standard method for establishing housing requirement figures.

'Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.'

2.25. It is proposed that the standard method would be a means of distributing the national housebuilding target of 300,000 new homes annually, and one million homes by the end of the Parliament, having regard to:

- the size of existing urban settlements (so that development is targeted at areas that can absorb the level of housing proposed);
- the relative affordability of places (so that the least affordable places where historic under-supply has been most chronic take a greater share of future development);
- the extent of land constraints in an area to ensure that the requirement figure takes into account the practical limitations that some areas might face, including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk. For example, areas in National Parks are highly desirable and housing supply has not kept up with demand; however, the whole purpose of National Parks would be undermined by multiple large scale housing developments so a standard method should factor this in;
- the opportunities to better use existing brownfield land for housing, including through greater densification. The requirement figure will expect these opportunities to have been utilised fully before land constraints are taken into account;
- the need to make an allowance for land required for other (non-residential) development; and
- inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions as well as offering sufficient choice to the market.

2.26. The standard method would make it the responsibility of individual authorities to allocate land suitable for housing to meet the requirement, and they would continue to have choices about how to do so: for example through more effective use of existing residential land, greater densification, infilling and brownfield redevelopment, extensions to existing urban areas, or new settlements. The existing policy for protecting the Green Belt would remain. We also propose that it would be possible for authorities to agree an alternative distribution of their requirement in the context of joint planning arrangements. In particular, it may be appropriate for Mayors of combined authorities to oversee the strategic distribution of the requirement in a way that alters the distribution of numbers, and this would be allowed for.

2.29. We have published a separate consultation on proposed changes to the standard method for assessing local housing need which is currently used in the process of establishing housing requirement figures. The future application of the formula proposed in the revised standard method consultation will be considered in the context of the proposals set out here. In particular, the methodology does not yet adjust for the land constraints, including Green Belt. We will consider further the options for doing this and welcome proposals.'

3.2. The proposal to impose binding housing requirements on local authorities, without any testing of the ability to deliver that requirement or whether it would

represent the most sustainable distribution taking account of, for example, the ability to provide sustainable transport or maintain settlement gaps, is a retrograde step. As referenced above this is likely to lead to unsustainable or undeliverable strategies for development as it is unlikely that any formula or algorithm would be sufficiently nuanced to lead to a sustainable distribution of development that can be applied in local plans.

- 3.3. Before the Duty to Cooperate was introduced a system of regional plans, and before that structure plans, set out the housing requirements for local plans that would cumulatively deliver a strategic vision for the region, sub-region or county. These plans could align constraints, regeneration opportunities and proposed infrastructure investment to ensure that plans met social, economic and environmental objectives and were tested through examination before being adopted. Whilst the Duty to Cooperate was fundamentally flawed, to simply remove it without any alternative proposals will lead to considerable uncertainty about how much development will take place and where. For example, under the revised standard method consultation proposals, London would be required to deliver over 90,000 homes per annum, whereas the highest delivery in recent years has been approximately 40,000 homes in one year. Imposing a binding requirement for a local plan will not mean that the homes can be delivered, unless the formula is able to build in the complexities of plan-making at regional or county level.
- 3.4. There are potential options as to how some form of testing could be reintroduced into the planning system to ensure that housing requirements for local plans are deliverable and will lead to sustainable outcomes. However, these revolve around some form of regional, county or sub-regional strategic planning and unfortunately there appears to be little appetite within government to explore anything of a larger scale than local plans.

4. Consultation Questions

- 4.1. The government consultation on the White Paper is in the form of a series of questions. The ones considered most relevant to PfSH are set out below.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

*8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?
[Yes / No / Not sure. Please provide supporting statement.]*

*8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?
[Yes / No / Not sure. Please provide supporting statement.]*

- 4.2. Members are asked to consider whether PfSH should respond to this consultation and, if so, the terms of that response. The response could then be drafted by the Chairman of the Planning Officers Group, following consultation with that Group, and signed off by the PfSH Chairman. It will be important to establish a clear direction for the drafting of that response at this meeting.

- 4.3. It is difficult to suggest possible responses to the questions on the standard method, given the lack of information as to how constraints will be factored in to the algorithm and the different impact that the revised standard method in the current consultation 'Changes to the Current Planning System' has on authorities in the sub-region.
- 4.4. In terms of strategic planning, in the absence of the Duty to Cooperate, members may wish to consider whether to suggest the model PfSH has operated for many years. PfSH has planned for the sub-region on both a statutory and non-statutory basis, setting out the vision and strategy and a distribution of development and strategic development locations to deliver them. Appropriate evidence has been secured to inform the sub-regional strategies which have then been implemented through local plans. Whilst there are alternative statutory arrangements available to combined authorities, the PfSH model may be appropriate in other parts of the country.

5. Next Steps

- 5.1. Given the uncertainties around such a significant change to the planning system and the need for primary legislation, the government has set out an incredibly ambitious timetable for new planning system to be introduced. Government has stated that the proposals allow for 30 months for new local plans to be in place and that it expects new local plans to be in place by the end of the next parliament. This will mean that government needs to consider responses to the consultation and take primary and secondary legislation through the parliamentary process by June 2021.
- 5.2. Given the absence of final proposals for how the standard method would take into account constraints or densification opportunities or any proposals for any form of strategic planning to replace the Duty to Cooperate, further proposals can be expected to be put forward. However, given the time constraints referenced above it is uncertain as to whether they would be subject to further consultation.

White Paper: Planning for the Future – Consultation Questions

The consultation questions from the White Paper are set out below to aid members' consideration of whether PfSH should respond to the consultation and, if so, the nature of the response.

1. What three words do you associate most with the planning system in England?

2. Do you get involved with planning decisions in your local area?

[Yes / No]

2(a). If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

[Social media / Online news / Newspaper / By post / Other – please specify]

4. What are your top three priorities for planning in your local area?

[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

5. Do you agree that Local Plans should be simplified in line with our proposals?

[Yes / No / Not sure. Please provide supporting statement.]

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

[Yes / No / Not sure. Please provide supporting statement.]

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

[Yes / No / Not sure. Please provide supporting statement.]

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

[Yes / No / Not sure. Please provide supporting statement.]

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

[Yes / No / Not sure. Please provide supporting statement.]

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

[Yes / No / Not sure. Please provide supporting statement.]

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

[Yes / No / Not sure. Please provide supporting statement.]

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

[Yes / No / Not sure. Please provide supporting statement.]

10. Do you agree with our proposals to make decision-making faster and more certain?

[Yes / No / Not sure. Please provide supporting statement.]

11. Do you agree with our proposals for accessible, web-based Local Plans?

[Yes / No / Not sure. Please provide supporting statement.]

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

[Yes / No / Not sure. Please provide supporting statement.]

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

[Yes / No / Not sure. Please provide supporting statement.]

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

[Yes / No / Not sure. Please provide supporting statement.]

15. What do you think about the design of new development that has happened recently in your area?

[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

17. Do you agree with our proposals for improving the production and use of design guides and codes?

[Yes / No / Not sure. Please provide supporting statement.]

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

[Yes / No / Not sure. Please provide supporting statement.]

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

[Yes / No / Not sure. Please provide supporting statement.]

20. Do you agree with our proposals for implementing a fast-track for beauty?

[Yes / No / Not sure. Please provide supporting statement.]

21. When new development happens in your area, what is your priority for what comes with it?

[More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

[Yes / No / Not sure. Please provide supporting statement.]

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

[Nationally at a single rate / Nationally at an area-specific rate / Locally]

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

[Yes / No / Not sure. Please provide supporting statement.]

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

[Yes / No / Not sure. Please provide supporting statement.]

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

[Yes / No / Not sure. Please provide supporting statement.]

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

[Yes / No / Not sure. Please provide supporting statement.]

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

[Yes / No / Not sure. Please provide supporting statement.]

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

[Yes / No / Not sure. Please provide supporting statement.]

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

[Yes / No / Not sure. Please provide supporting statement.]

25(a). If yes, should an affordable housing 'ring-fence' be developed?

[Yes / No / Not sure. Please provide supporting statement.]

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Appendix 4

PfSH Current Local Plan Status

The current local plan status is set out in the table below.

Local Planning Authority	Adopted Local Plan	Emerging Local Plan		
		Stage reached	Next stage – LDS	Next stage - probable
East Hants	2011 – 28 Part 1 LP adopted in May 2014, Part 2 LP adopted in April 2016	Reg 18 consultation	Reg 19 consultation June 2020	Website indicates consultation unlikely in 2020
Eastleigh	2001 – 11 Adopted 2006	Plan submitted for examination – Inspector’s post hearing letter – 4/20	N/A	Proposed modifications – end of 2020
Fareham	2006 – 26	Reg 18 consultation	Reg 19 consultation – Autumn 2020	Reg 19 consultation – Autumn 2020
Gosport	2011 – 29 Adopted October 2015	Evidence gathering	Reg 18 consultation Dec 2019	Delay – reg 18 consultation likely early 2021
Havant	2006 – 26	Reg 19 consultation	Submission Q4 2020	Reg 19 consultation from October 2020
New Forest District	2016 – 36 Plan adopted 6/7/20			
New Forest National Park	2016 – 36 Plan adopted 29/08/19			
Portsmouth	2006 – 27	Evidence gathering	Reg 18 consultation Early 2021	LDS revised in August 2020. Further changes possible tbc on government policies changes
Southampton	2006 – 26 Core Strategy Partial Review and City Centre Action Plan adopted March 2015	Reg 18 consultation	Further Reg 18 consultation Oct 20	Timescale under review
Test Valley	2011 – 29	Reg 18 consultation	Reg 18 (preferred approach local plan) consultation Q1	Reviewing scope and timetable in light of the Planning White Paper

			2021	
Winchester	2011 – 31	Evidence gathering	Consultation on Local Plan Strategic Issues & Options – Sep 20	Work on the local plan has paused in order to fully assess the implications of the government consultation documents