

# Gosport Borough Council

## Housing Delivery Test Action Plan 2021-2022

August 2021



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## **APPENDIX ONE: GOSPORT HOUSING DELIVERY TEST ACTION PLAN August 2021**

## 1.0 INTRODUCTION

### National Background

- 1.1 In a bid to address the national housing crisis, the Government published its Housing White Paper, named 'Fixing our broken housing market' in February 2017. The white paper set out the Government's plans to boost the supply of new homes in England and over the longer term, create a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and supports economic prosperity. The white paper outlined that the country needed between 225,000 to 275,000 more homes per year to keep up with population growth in order to start tackling years of under-supply at the national level. The Government has since committed (in the autumn budget of 2017) to delivering 300,000 homes per year by the mid-2020s.
- 1.2 The actual annual net additional dwellings for England has fallen significantly short of delivering the most recent housing target of 300,000 homes per year for England. However, the annual number of additional dwellings had increased to its highest level for over 20 years for the 2019/20 period of 243,770 dwellings, 1% higher than the 2018/19 period. Net housing supply dropped significantly in England in the years following the economic downturn that commenced in 2008/09, but has since recovered to just above previous levels. The long-term impacts of the Covid 19 pandemic on housing supply and completions are yet to be fully realised.
- 1.3 The white paper was followed up by revisions to the National Planning Policy Framework (NPPF) in July 2018 (later revised in February 2019 and July 2021) and updates to National Planning Practice Guidance (PPG). Both these documents have introduced a number of new measures and reforms to the planning system intended to deliver more housing, improve housing affordability and where possible, remove barriers to new housing development.
- 1.4 Local planning authorities have an important and longstanding role in planning for and demonstrating a sufficient supply of housing in their area. The Housing Delivery Test (HDT) is one of the Government's new initiatives to boost housing growth and to encourage local planning authority's to have a more proactive role in supporting housing delivery in its area, as well as taking accountability for under-delivery.
- 1.5 The production of this second Housing Delivery Test Action Plan (HDTAP) is a direct result of the national HDT measurement for 2020 published by the Department of Communities and Local Government (CLG) on 19 January 2021 for Gosport Borough Council. It should be noted that the HDT measurement is produced annually and as such this HDTAP will be kept under review and updated accordingly.

### Local Background

- 1.6 Gosport Borough Council (GBC) recognises the Government's commitment to boost the delivery of new homes and has responded to this challenge by taking a proactive approach to working with developers and landowners to facilitate delivery on a number of very complex brownfield sites. The current Gosport Borough Local Plan 2011-2029 (GBLP') was adopted in October 2015 following an Examination in Public

(EiP). The Local Plan sets out that during the plan period 2011 to 2029 the housing target is 3,060 net new dwellings with an average delivery of 170 per annum.

- 1.7 GBC has long-recognised constraints on the availability of sites and limitations of highway infrastructure associated with its peninsula location. These constraints have been recognised at both sub-regional and regional level and have informed previous higher-level development plans and the current South Hampshire Strategy<sup>1</sup>. Nonetheless, GBC will continue to contribute towards the overall sub-regional requirements in South Hampshire by taking a positive approach towards new residential development.
- 1.8 The Action Plan does not set out any possible impacts of the ongoing Covid 19 pandemic as the three year period which informed the Housing Delivery Test result ended on 31<sup>st</sup> March 2020. It is currently anticipated that future iterations of the Action Plan will set out any implications for housing delivery arising from the pandemic although the extent of this is as yet unknown.

#### Housing Delivery Test

- 1.9 The Housing Delivery Test (HDT) was introduced by the Government as a monitoring tool in order to speed up the delivery of housing<sup>2</sup>. The HDT is an annual measurement of housing delivery in terms of the total number of new houses and flats completed in a local authority area annually. The first set of HDT results were published in February 2019 and the second set of HDT results were published in February 2020 which were set out in the Council's first HDTAP in July 2020.
- 1.10 The HDT will be used to determine the level of consequences applied to the local authority where the delivery of the housing requirement has not been met. The national Planning Practice Guidance (PPG)<sup>3</sup> provides further details on Government planning policies set out in the National Planning Policy Framework (NPPF), including the Housing Delivery Test measurement. This states where delivery of housing has fallen below the housing requirement, certain policies set out in the NPPF will apply. Depending on the level of delivery these are:-
  - The authority should publish an action plan if housing delivery falls below 95%;
  - A 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
  - Application of the presumption in favour of sustainable development if housing delivery falls below 75% subject to the transitional arrangements (NPPF Paragraph 222).
- 1.11 These consequences apply concurrently. For example, those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent HDT measurement is published. The relevant consequences for any under-delivery will then be applied. Should delivery meet or exceed 95% no consequences will apply. The NPPF Paragraph 222 sets out that the 'presumption in favour of sustainable development' applies where the HDT falls below 75%.

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<sup>1</sup> <https://www.PfSH.gov.uk/work/planning-and-infrastructure/PfSH-position-statement/>

<sup>2</sup> <https://www.gov.uk/government/collections/housing-delivery-test>

<sup>3</sup> <https://www.gov.uk/guidance/housing-supply-and-delivery>

1.12 In line with NPPF Paragraph 11, the primary implication of the presumption in favour of sustainable development for decision takers is that policies which are most important for determining applications are out of date and hence planning permission should be granted unless (emphasis added):

- The application of policies in the NPPF that protect areas or assets of particular importance provides a *clear* reason for refusing the development proposed; or
- Any adverse impacts of doing so would *significantly and demonstrably outweigh* the benefits when assessed against the policies in the NPPF as a whole.

1.13 However, Gosport Borough is surrounded by international habitat designations (Special Protection Areas and Special Areas of Conservation, amongst others) and therefore the entire Borough is subject to Habitats Regulations. This results in the Borough falling within the zone of influence where housing development is likely to have a significant effect on the integrity of the designations. As such, it is not possible to automatically apply the presumption in favour of sustainable development as a likely significant effect cannot be ruled out without the completion of an Appropriate Assessment (AA). This is in line with the NPPF (2021) Paragraph 182:

*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*

#### Purpose, Aims and Status of the Document

1.14 The main aims of the Housing Action Plan are as follows:

- To provide a short summary of the Council's HDT results and its implications;
- To provide an analysis of the key reasons for the historic under-delivery of new homes in the Borough against its housing requirement;
- To identify the measures the Council has already undertaken and intends to take to increase and accelerate the delivery of new housing in the Borough; and
- To identify the monitoring arrangements for the Housing Action Plan

1.15 The Council recognises that delivering growth within the Borough is complex. Whilst it is noted that a number of the actions identified in the Housing Action Plan are principally within the remit of the Council to resolve (such as the production of planning documents and the timely determination of planning applications for housing schemes), the Council will also need support and the co-operation of those involved in delivering new homes including landowners, developers, land promoters, infrastructure providers (such as utility providers) and upper tier authorities (i.e. Hampshire County Council).

## Scope of the Housing Delivery Test Action Plan

1.16 The remainder of this Housing Action Plan is structured as follows:

- *Section 2* – This section summarises the Housing Delivery Test (HDT) introduced by the Government and provides a summary of the Council's most recent results and its implications.
- *Section 3* – This section provides a summary of the local housing market and delivery context and endeavours to provide the key reasons for the under-delivery of new homes in the Borough against its housing requirements.
- *Section 4* – This section provides a summary of the key measures the Council intends to undertake in order to provide a step change in housing delivery for the Borough.
- *Section 5* – This section provides details of how actions set out in the Housing Action Plan will be implemented, managed and monitored, including any relevant reporting arrangements.

## 2.0 HOUSING DELIVERY TEST RESULTS

### Housing Delivery Test Results for Gosport (January 2021)

- 2.1 The third and current HDT measurement (known as HDT measurement 2020) was published by the MHCLG on 19 January 2021. This stated that Gosport Borough Council has an HDT measurement result of 84% and has therefore resulted in the Council needing to publish its second Housing Action Plan (this proposed document) and to add a 20% buffer to its five year housing land supply position.
- 2.2 Table 1 below outlines the HDT targets for the three annual periods considered for the latest HDT measurement. The 'number of homes required' set out in the table is based on the 170 dwellings required each year in the Adopted Gosport Borough Local Plan. However the Government has adjusted each local authority's requirement for 2019/20 due to the first national lockdown announced on 23 March 2020 for Covid-19, which caused some temporary disruption to local planning authority planning services and the construction sector. Consequently the reduced 'homes required' within the 2019/2020 year equates to 156 dwellings for Gosport (the equivalent of a single month).

Table 1: Gosport Borough Performance against the Housing Delivery Test (2017/18 – 2019/20)

	YEAR			Total
	2017/18	2018/19	2019/2020	
Number of Homes Required	170	170	156	496
Number of Homes Delivered	221	58	135	414
Number of Homes Delivered less Required	+51	-112	-21	-82
Housing Delivery Test Result				84% <sup>4</sup>
Housing Delivery Test Consequence	<b>ACTION PLAN and 20% Buffer</b>			

- 2.3 This confirms that Gosport Borough Council is required to publish a Housing Action Plan and to add a 20% buffer to its five year housing land supply position. The Council recognises that developers in the Borough did not deliver sufficient housing to meet the locally identified housing need during this period. The Council is therefore seeking to assist and has the ambition to increase both the quantum and speed of new housing delivery within the Borough. The attached Housing Delivery Test Action Plan (Appendix 1) forms part of the response that will aim to facilitate this change.

<sup>4</sup> Rounded-up

### 3.0 BARRIERS TO HOUSING DELIVERY

3.1 In the preparation of this Action Plan a range of key issues have been identified for Gosport that is impacting upon housing delivery. These issues have been identified through emerging evidence for the forthcoming Gosport Borough Local Plan 2038 and engagement between GBC Officers in Housing, Development Management and Planning Policy. This section sets out more detail on the barriers to housing delivery that have been identified.

#### Gosport Housing Land Supply

3.2 The latest housing supply position reflected in the Government's HDT published results was undertaken on 1 April 2020 and is documented within Council's latest Authority Monitoring Report published in December 2020. This housing supply position is updated by the Council at least for each financial year in order to ensure that the Council's five year housing land supply position remains up-to-date. As part of this process, the Council identifies all dwellings that have been completed during the period, all housing sites where construction is underway and all sites with extant planning permissions (or with a resolution to grant planning permission) as of the 1 April 2020. In total, the number of dwellings that either have extant planning permissions (or a resolution to grant planning permission) as of 1 April 2020 (and are anticipated to come forward) was 1,218 (net) dwellings. (Table 2 below).

Table 2: Composition of Housing Supply as of 1 April 2020  
(as published in the Council's AMR (December 2020))

Five Year Housing Requirement for Gosport		
	Dwellings	Annual Average
Housing Requirement 2011 to 2029 (GBLP)	3,060	170
Total Completions 2011 to 2020 (net)	1,166	129.5
Housing Requirement 2019/20 to 2028/29	1,894	210.4
5 Year Requirement 2020 to 2025 (5 x 210.4) (a)	1,052	210.4
5 % Buffer (b)	52.6	n/a
<b>Total 5 year Requirement (a + b)</b>	<b>1,105</b>	<b>221</b>

Five Year Supply of Deliverable Housing Sites – 1 April 2020 to 31 March 2025		
Sites with planning permission (including C2 as C3 equivalent)	610	n/a
Other Deliverable Sites	494	n/a
<b>Sub-total Deliverable Sites</b>	<b>1,104</b>	n/a
Windfall	114	n/a
<b>Total Deliverable Sites</b>	<b>1,218</b>	n/a



3.3 As set out the latest five year housing land supply position was undertaken on 1 April 2020 and is documented within the Council’s Authority Monitoring Report that was published in December 2020. This demonstrated a five year housing supply figure of 5.8 years including a 5% buffer. However, the HDT measurement for 2020 confirms that the Council delivered only 84% of its target for the last three-year period so the Council now has to apply a 20% buffer to its five year housing land supply position. As such, the Council is obliged to revise its December 2020 Housing Supply position to take account of a 20% buffer which replaces the pre-existing 5% buffer. This is set out in Table 3 below.

Table 3: Revised Housing Supply Position (August 2021)

Five Year Housing Land Supply position for period between 1 April 2020 and 31 March 2025	
Five Year Housing Requirement	1,052
20% buffer	210
<b>Five Year Housing Requirement including 20% Buffer</b>	<b>1,262</b>
Five Year Housing Land Supply (Projected Net Housing Completions) <sup>5</sup>	1,218
Projected Completions above/below requirement	44
Five Year Housing Land Supply against Requirement	<b>4.83 years (or 96.51%)</b>

3.4 In light of the HDT figures and the imposition of the 20% buffer, the Council can no longer demonstrate a five year supply of deliverable sites. For reference, this updates the Council’s housing land supply position as set out in Paragraph 5.26 of the Authority Monitoring Report (AMR) December 2020. This change will be reflected in the next AMR due to be published in December 2021.

3.5 Furthermore, it is likely that the five year housing land supply will be subject to significant amendment in the next couple of years as the full implications of the Covid 19 pandemic and the Solent nitrates issue becomes clearer.

3.6 Some of the current Local Plan Allocations have, recently, had slower than anticipated delivery on key sites. This is a consequence of site complexity which has had an impact on delivery. A large proportion of the existing planning permissions not yet completed are at former MoD sites such as Daedalus and at Haslar Hospital. The delays in housebuilding on both sites account for a significant proportion of the under delivery over the whole plan period and over the past 3 years and hence the need to produce a HDT Action Plan.

3.7 The delays are also partly due to the complexities of both sites but also decisions by the respective land owners: Government Agencies (South East England Development Agency (SEEDA), Homes and Communities Agency (HCA) and Homes

<sup>5</sup> The total housing land supply for the remaining plan period to 2029 is 1,923 dwellings.

England (HE) at Daedalus and a private consortium at Haslar. However, GBC recognises that significant development is now underway at Daedalus (Wates Homes) and now sustained activity has been taking place at Haslar.

### **Infrastructure**

- 3.8 GBC is actively engaged in a number of strategic projects to deliver key infrastructure to help facilitate the delivery of new housing. This includes working with the Partnership for South Hampshire (PfSH), the Solent Local Economic Partnership (LEP), Hampshire County Council (HCC) and neighbouring local authorities in pursuing cross border initiatives.
- 3.9 A recent review of existing economic infrastructure provision to, from and within the Gosport Borough produced on behalf of the Solent LEP (see Section 3.7) does not highlight any fundamental over-riding constraints in terms of infrastructure provision or capacity constraining short-term development in overall terms. Many smaller-scale infrastructure requirements can be addressed incrementally as new development comes forward.
- 3.10 However, there are some broader infrastructure issues – notably ongoing risks associated with tidal flooding / coastal defences, pressures on the Borough’s transport networks and the relatively uncompetitive resident skills position – which could undermine Gosport’s ability to deliver transformative economic growth and change. In addition, these may impose additional costs that impact the financial viability of residential development proposals.

#### *Access and Transport*

- 3.11 A key infrastructure issue for the Borough of Gosport is improving vehicle access to and from Gosport Peninsula, including better links to Portsmouth and the strategic road network. Enhancing overall accessibility and connectivity to and from Gosport Peninsula, in turn supports the attractiveness of Gosport as a business location. Improvements to strategic highways in the local area such as the recently commenced Stubbington Bypass and the completed Newgate Lane will improve accessibility for local people in conjunction with the Bus Rapid Transit scheme which improves connections with Fareham, including its railway station.
- 3.12 However, the traffic levels on the A32 remain consistently high and Gosport remains, as it has for decades, the largest town in terms of population with no railway station. Hence, these access issues will remain until such time as significant transport investment is made. This also highlights the importance of providing sufficient employment opportunities on the Peninsula to reduce out-commuting and congestion.

#### *Flooding Infrastructure*

- 3.13 Flood risk is a very significant environmental constraint to development in Gosport. The Gosport Strategic Flood Risk Assessment (SFRA) shows the main source of flood risk to the Borough comes from tidal flooding<sup>6</sup>. There are significant areas of

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<sup>6</sup> There have been some historical incidences of flooding occurring from other sources of flooding within the Borough including surface water run-off due to the Borough’s predominant urban nature and flooding caused by infrastructure failure (drains).

land that fall within the Environment Agency's defined Flood Zone maps. The areas of the Borough at risk from tidal flooding are:

- Portsmouth Harbour including Forton and Haslar Lake;
- Stokes Bay; and
- The Alver Valley

Of these areas, development at and the southern end of Portsmouth Harbour including adjacent Haslar Lake as well as the Solent frontage on the Haslar Peninsula are those where new housing could be potentially delivered in line with the Local Plan. These sites will need to address flood risk in accordance with national guidance and the policies in the Adopted Local Plan and the forthcoming Local Plan 2038.

- 3.14 Many of the coastal frontages in Gosport are relatively low-lying and are subject to some form of existing coastal defence structure. However, coastal defences in Gosport are also likely to be susceptible to climate change, as 100 years of predicted sea level rise would mean that most defences would fail, at their current level, to offer protection from a 1 in 200 year tidal flood.
- 3.15 In line with this, a number of flood risk evidence studies<sup>7</sup> set out that to sustain future development in Gosport, particularly in high risk or highly vulnerable parts of the Borough, significant investment in flood defences and flood defence infrastructure will be required. The Coastal Partners (formerly the Eastern Solent Coastal Partners (ESCP)) was formed in 2012 to deliver a coastal management service across the coastlines of Fareham, Gosport, Havant and Portsmouth authority areas and delivers a range of coastal flood and erosion risk reduction projects which could benefit existing housing and enhancing the shoreline for local communities. For example, coastal defences will be essential to deliver proposals for the Strategic Sites identified within the Gosport Waterfront and Fort Blockhouse.
- 3.16 As such, flood defences are considered essential for the delivery of the Local Plan and hence the delivery of housing. The Council including as part of the Coastal Partners will continue to work with relevant organisations on determining both the source of new funding and approximate costs. The scale of the costs of such as infrastructure will impact overall site viability.

### **Local Housing Market**

- 3.17 The South Hampshire Strategic Housing Market Assessment (SHMA) (GL Hearn January 2014) was commissioned by the PFSH authorities to gain an up-to date understanding of the objectively assess housing needs of the South Hampshire

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<sup>7</sup> North Solent Shoreline Management Plan (December 2010); Flood Risk Assessment (GBC 2014); Strategic Flood Risk Assessment (SFRA) for the South Hampshire sub region (Atkins 2007) and PFSH Strategic Flood Risk Assessment 2016 (undertaken by the Eastern Solent Coastal Partnership on behalf of PFSH); The River Hamble to Portchester Castle Flood and Coastal Erosion Risk Management Strategy, 2016, Eastern Solent Coastal Partnership.

housing market in order to inform the review of the South Hampshire Strategy. The SHMA has defined the extent of the relevant housing market area covering the PfSH area and then considered the objectively assessed need for housing within them. The report has considered the overall need for housing, the need for different types of homes and the housing needs for different groups within the community in line with the requirements of the NPPF.

Key points identified in the SHMA with regard to Gosport include:

- The lowest median house price of all the PfSH Districts
- Gosport is comparatively affordable compared with some Hampshire Districts (Eastleigh, Fareham, New Forest, Test Valley, Winchester & East Hampshire) but less affordable than Portsmouth, Southampton and Havant
- Demand from HM Forces households based in various training complexes and people working in the Royal Navy supply chain
- Much of the Borough is away from the M27 corridor and less well connected to employment opportunities along it
- Parts of Gosport and Fareham can be viewed as a local market
- Gosport offers an alternative housing offer to Portsmouth; and
- Lee-on-the-Solent is a popular retirement destination

- 3.18 In summary, Gosport, whilst part of the larger Portsmouth HMA, has a notable localised housing market with specific factors impacting it. Primarily, the impact of its physical geography – a peninsula settlement – and the resulting transport challenges will not change without very significant investment to enable a move towards a primary change in modal shift. In addition, the dense urban character of the area (see Section 2.5 below) and comparative lack of developable housing sites results in Gosport having a limited choice in sites. This together with the characteristics of the local housing market can restrict the number and range of developers active in the area, which in itself can impact on delivery

## **Environmental Issues**

### *Nitrates*

- 3.19 As of early 2019, the issue of nitrate pollution is arguably the most significant barrier to the delivery of housing in South Hampshire including all of Gosport Borough. Natural England's scientific advice to local authorities has meant any residential development which would contribute to nitrate pollution in the Solent, following recent European Court of Justice rulings on the issue, should not be permitted unless there is a robust mitigation scheme in place which requires that a development is nitrate neutral. Whilst nitrate pollution arises from a number of sources, including in particular agricultural run-off and outfalls, new occupied dwellings would add to the pressures through the waste water generated. Nutrient overload creates vast mats of algae over the Solent's mudflats, stopping oxygen getting through to the animals in the sediment and causing mass mortality, especially in hot weather. Natural England considers that the existing high levels of nitrates are causing harm to the ecosystem and failure of environmental standards.
- 3.20 Essentially, by virtue of the nitrate issue, no homes can be built in South Hampshire without adequate mitigation. This has resulted in a number of planning applications

the Council is considering being kept 'on hold' as applicants have not been able to secure mitigation. The Partnership for South Hampshire (PfSH), Natural England, and Environment Agency have worked jointly to develop an Integrated Water Management Strategy (IWMS), this was published in 2018. The IWMS examines the potential for the sub-region to accommodate future housing growth without having a detrimental effect upon the water environment. A Water Quality Working Group has since been set up with a current focus on nitrogen neutrality and an appropriate mitigation scheme. During the monitoring period covered by the latest HDT it is estimated that 50 dwellings were solely backlogged because of the nutrients issue with a further 120 dwellings were significantly or principally backlogged because of the nutrients issue. This figure is equivalent to the annual Local Plan requirement and whilst recognising that these are permissions not completions (which is what the HDT measures), it is clear this will have a more significant impact over the next three years of HDT results. Section 4 sets out current actions aimed to overcome this barrier.

### *Townscape and Landscape*

- 3.21 The physical and environmental constraints of the Borough strongly influence its capacity to accommodate new dwellings, with the sea to the south, Portsmouth Harbour to the east and Fareham Borough, with 'strategic gaps', to the north and west. A key challenge is therefore to balance the need for development against the need to minimise the impact on the quality of the natural and built environment in Gosport. The main area of countryside is the Alver Valley Country Park (AVCP) which is Gosport's main green lung and given its importance to local society is not considered to be suitable for housing development. Indeed the AVCP is recognised as being of sub-regional importance and is included in the South Hampshire Green Infrastructure Strategy and is recognised as a Suitable Alternative Natural Greenspace (SANG) due to its ability to deflect recreational pressure from internationally important coastal habitats. In addition much of the Alver Valley is reclaimed land after being used for quarrying then subsequent landfill operations. Consequently the site is protected as a Country Park in the Local Plan.
- 3.22 Additionally, some parts of the Borough are already intensely developed or the local characteristics are such that they make it very difficult to facilitate further significant housing development. For example, there is a predominance of suburban housing with relatively few areas where larger scale growth and change can be easily accommodated. Future housing growth within established suburban areas is likely to be limited to suitable infill plots and changes of use.

### **Development Viability**

- 3.23 Ultimately the barriers expressed above relating to market attractiveness and costs of development determine how viable a development will be and whether the risks are worth taking by a developer. As highlighted above transport and accessibility have an impact on market attractiveness including limiting access to employment opportunities; whilst large on-site infrastructure requirements such as flood infrastructure significantly affect development costs together with issues associated with on-site contamination and neglected historic buildings as well as nature conservation issues that need to be mitigated. The Borough's key brownfield sites have all these issues hence the complexities associated with delivery.

- 3.24 The Gosport Local Plan and the supporting Community Infrastructure Levy (CIL) have been prepared with plan-wide viability appraisals and as such on a general level viability has not been a significant Borough-wide issue affecting housing delivery.
- 3.25 However, there are some sites within identified regeneration areas which have not come forward in part due to uncertainty with regard to viability. This is linked to necessary policy requirements for the area and specifically flood risk infrastructure to accommodate a provision of residential development and/or other sensitive uses.
- 3.26 Understandably, there have been delays to the determination of some planning applications due to the time involved in addressing complex on-site issues and the negotiation of planning obligations including affordable housing, education and transport contributions. Some of these delays are linked to the processes for appraising planning application viability assessments for example with regard to affordable housing provision.
- 3.27 The requirement to assess viability forms part of the NPPF and is a requirement of the CIL Regulations. As such, the emerging Local Plan 2038 will be subject to a plan wide viability study which is included as an action to be commenced in the Action Plan.

## 4.0 KEY ACTIONS

### Gosport Borough Local Plan allocations and policies

- 4.1 Gosport is responding positively to the challenge of housing delivery. Gosport has very little greenfield land available for potential housing development given that it is heavily urbanised and that the significant open areas it does have, such as for example the Alver Valley Country Park, are of strategic importance to the Borough and the local communities, to provide necessary access to open space without making private vehicular journeys to places further afield. As such, these remaining strategic spaces will not be considered for housing development.
- 4.2 The current Local Plan includes a presumption in favour of development within the urban area boundary which covers the large majority of the Borough and allows additional sites to come forward for development provided it accords with the other policies of the Local Plan which seek to secure a sustainable community.
- 4.3 The Plan identifies several strategic Regeneration Areas (RA) within the urban areas for mixed-use development including new housing development. The RAs prioritise the re-use of previously developed land for mixed-use development primarily including housing, employment, environmental and access improvements. In addition there are a number of non-strategic housing allocations which help to secure a mix of housing types in the Borough.
- 4.4 The Council is currently reviewing the Local Plan. The emerging Local Plan 2036 (LP2038) will have regard to changes to national planning policy since 2015, new evidence studies, public consultation, the Partnership for South Hampshire (PFSH) Spatial Position Statement published in 2016 and a revised PFSH Position Statement. Further details on the Local Plan and the LPR are set out on the GBC website<sup>8</sup>.
- 4.5 The RAs are proposed to be retained within the LP2038 at the Regulation 18 public consultation stage proposed for Autumn 2021. Each of the RAs identified has their own specific challenges and opportunities. As such, in order to support the delivery of housing for each RA a policy framework in the form of over-arching policies and strategic development sites is proposed to be set out.
- 4.6 In conjunction with housing delivery, designated employment land is likely to be retained given that Gosport has the lowest jobs ratio in the South East. As such, current employment land released for housing in Gosport is limited. In recent years land that has been made available for employment use has been built-out and taken-up relatively quickly suggesting that the demand remains strong for this form of development.
- 4.7 The general housing policies in the adopted Local Plan are continually kept under review to monitor their effectiveness. This is reported through the Authority Monitoring Report<sup>9</sup>. To inform this review, the evidence base is currently being updated including

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<sup>8</sup> <https://www.gosport.gov.uk/localplan2029> and <https://www.gosport.gov.uk/gblp2038>

<sup>9</sup> <https://www.gosport.gov.uk/amr>

the Strategic Housing Land Availability Assessment (SHLAA)<sup>10</sup> and demographic analysis to inform housing market requirements.

- 4.8 As part of the production of the SHLAA the Council has made proactive attempts to identify additional land for housing. This has included two “call for sites” which comprised targeted requests to agents, landowners and developers. The Council has also kept the call for sites open on the GBC website.
- 4.9 The Council is committed to a new Local Plan and intends to undertake a Regulation 18 public consultation on a draft Local Plan in Autumn 2021. The RAs are proposed to be retained and will remain the main focus of housing delivery in Gosport. The LP2038 will seek to encourage the most efficient use of land balanced against the need to provide development sympathetic to heritage assets and their setting (see section 3.3 *Heritage Action Zone* below). As part of the consultation process the Council will continue to consider additional sites for residential development should they come forward.

#### *Supplementary Planning Documents*

- 4.10 The Council has adopted a number of Supplementary Planning Documents (SPD) which support the delivery of housing. In particular the Gosport Waterfront and Town Centre SPD has identified a whole range of sites within the Regeneration Area (as defined in the GBLP) that could come forward for development including under-utilised sites such as the police station, Gosport Precinct and various car parks.

#### **Working with Others**

- 4.11 Due to the constraints on land availability outlined in Section 2, the Council is proactive working with other local authorities to meet the Borough’s unmet housing need. This section summarises the Duty to Co-operate and Statements of Common Ground with regard to housing delivery.
- 4.12 The Localism Act 2011 sets out the statutory framework regarding the duty to cooperate. The duty to co-operate covers a number of public bodies and these are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Further information is contained in the National Planning Policy Framework (NPPF) (paragraphs 24 – 27, NPPF 2019).
- 4.13 Local authorities are under a Duty to Co-operate with each other and with other prescribed bodies on strategic matters such as housing, economic growth, transport and infrastructure provision which have cross-boundary implications. This needs to be undertaken constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.
- 4.14 In South Hampshire, there is a long history of cross-boundary working between local authorities and their strategic partners. GBC has been a founding member of the Partnership for Urban South Hampshire (PUSH) which was formed in 2003 and renamed the Partnership for South Hampshire (PfSH) in 2019. PfSH includes twelve

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<sup>10</sup> <https://www.gosport.gov.uk/article/1309/Part-E-Topics-Evidence-Studies-and-Guidance>



local authorities and closely collaborates with the Solent Local Enterprise Partnership, the Environment Agency, Natural England and Homes England.

- 4.15 Work undertaken by PfSH has been a core element in demonstrating collaborative working on strategic cross boundary issues between the various local authorities within the sub-region. The role of PfSH was a critical element cited in the Council's Duty to Cooperate Statement (2014) produced for the Examination in Public for the current GBLP. This sets out how the Borough Council works with its neighbouring partners and other key organisations on common issues. The Duty to Co-operate Statement can be found on the Council's webpage.
- 4.16 In June 2016 the South Hampshire Spatial Position Statement was published, it sets out development targets for each Council to 2034. It is based on significant cross-boundary evidence and will assist local authorities in meeting the duty to cooperate on strategic and cross-boundary matters. Further work is currently being undertaken to update the evidence base to take into account the provisions of the latest NPPF including the provisions of the Standard Methodology. This will inform a new spatial strategy covering the period to 2038 with a long term vision to 2050. The document will also represent a multi-lateral statement of common ground.
- 4.17 Statements of Common Ground (SoCG) are being prepared and will be maintained on an on-going basis throughout the plan making process. The advice in the national Planning Practice Guidance (PPG) is that as a minimum these statements should be published when the area covered and the governance arrangements for the co-operation process have been identified and the substantive matters to be addressed have been determined. The SoCG can then be used to identify any outstanding matters that will need to be addressed and the process for reaching agreements and where possible an indication of when such statements are likely to be updated.
- 4.18 At this stage work is ongoing on the following statements:
- Partnership for South Hampshire (multi-lateral statement covering the South Hampshire sub-region); and
  - Fareham Borough Council (bi-lateral statement covering cross-boundary issues).

It is currently anticipated that significant progress will continue to be made on these statements over the next 12 months.

### **GBC Development Management Processes**

- 4.19 The Council has not identified that Development Management (DM) planning processes as a barrier to housing delivery. However, it is recognised the importance of monitoring its performance and addressing any issues that may arise. It can be seen from Table 4 below on determining planning applications that the Council's performance and the speed of decision making over the last three years is good and that any delays are within an acceptable limit. As such, the Council is content to conclude that it has efficient DM planning processes in place. It is recognised that a number of applications have been affected by the nitrates issue and it is considered

that the actions identified later in this section will assist in being able to grant further planning consents where the appropriate mitigation has been secured.

Table 4: Percentage of applications determined in time within the last three years

Year/ Period	Major	Minor	Others	Total Applications	Total Applications
2018/19	100%	65%	84%	300	79%
2019/20	100%	87%	95%	302	93%
2020/21	86%	96%	96%	283	96%
<b>2018- 2021</b>	<b>95%</b>	<b>80%</b>	<b>92%</b>	<b>885</b>	<b>89%</b>

- 4.20 There are a number of major development sites that are due to come forward over the LPR plan period to 2038. In order to ensure that these are dealt with in the most efficient manner the Council has appointed a Principal Planning Officer with responsibility to provide detailed pre-application advice, enter into early stage negotiations in respect of s106 Agreements and liaise with other Council departments and other stakeholders. The aim is to ensure that the application process through to decision making is as smooth as possible by providing continuing and greater certainty for all parties involved.

#### **Nitrates mitigation measures**

- 4.21 As highlighted above the nitrates issue has been a major barrier for housing delivery over the past 2 years. The Council is working proactively to secure appropriate mitigation both unilaterally and multi-laterally through PfSH. Actions have included:
- Retrofitting of water efficiency measures in Council housing stock to safeguard Heritage Lottery Funding and other external funding to deliver a mixed use scheme including residential development at Priddy's Hard. Further retrofitting measures will be used to mitigate future GBC housing schemes.
  - Negotiations with landowners to secure nitrate credits by off-setting agricultural land. Schemes include land secured by the Hampshire and Isle of Wight Wildlife Trust as well as private landowners. A list of appropriate schemes which have satisfied Natural England are available on the Council and PfSH websites. Developers are directed to these schemes to start negotiations to purchase the relevant credits. A number of developers in the Borough will benefit from such schemes and currently the Council are awaiting the Section 106 agreements to be signed by all parties including the relevant local authorities in which the mitigation site is located. This is necessary in order to ensure relevant compliance/enforcement measures are in place. It is envisaged that these will be in secured in the Autumn 2021 which will enable the relevant houses to be occupied. This will then be the template for further mitigation sites to be used and for other developers to purchase the relevant credits.
  - Contribution to a dedicated temporary PfSH officer to derive relevant solutions for the PfSH area. This includes the potential of a local authority funded mitigation scheme to assist small and medium sized developers to purchase credits from each local authority. Further details are currently being drafted and this will be reported at a future Council Board.

- PfSH is working with MHCLG and DEFRA to pilot a nitrate scheme in part of the PfSH area which could be in place in 2022 and rolled out across the sub-region
- Arrangements secured with Homes England to utilise agricultural land outside the Borough to enable housing to take place at Daedalus

### **Heritage Action Zone (HAZ)**

- 4.22 Historically, Gosport was a naval town associated with the defence and supply infrastructure of Her Majesty's Naval Base (HMNB) Portsmouth and is still home to HMS Sultan, Defence Munitions and a Helicopter Repair base (now operated by a private company). The legacy of Gosport's naval history has left the town with numerous buildings of historic interest; many designated heritage assets are found within the Local Plan regeneration areas. What remains of these naval sites and buildings in military ownership is potentially contracting via strategic land releases. As a result, important aspects of Gosport's military heritage and legacy are now at risk unless alternative, appropriate uses can be found for the historic buildings.
- 4.23 The Gosport Heritage Action Zone (HAZ)<sup>11</sup> is needed to help address this critical situation of a number of key regeneration sites all coming forward for redevelopment across the Borough at a time when there are limited local resources (both staff and financial) to address a range of complex deliverability issues, with heritage a common theme. The proposed HAZ, to be delivered through a Gosport HAZ Delivery Plan, has the aim of enabling the successful delivery of these sites through creative solutions to ensure that historic buildings have the appropriate modern-day and commercial uses and that their historic environment is still respected whilst generating much needed local economic growth. Delivery of residential development will be an important element of some of the projects
- 4.24 The Gosport HAZ Delivery Plan will be delivered by teamwork through a range of partners including the Defence Infrastructure Organisation, One Public Estate, Portsmouth Naval Base Property Trust, Fareham College, Hampshire County Council, Hampshire Cultural Trust, Coastal Partners and the Gosport Society.
- 4.25 Key projects that can assist delivery include:-
- Masterplanning at Blockhouse in partnership with the DIO which will identify the barriers of delivery and ways to overcome them, the quantum of development and help secure new investment. The site has the potential to deliver significant economic regeneration particularly in the marine sector as well as delivery of a new high quality residential quarter;
  - Feasibility work to help unblock barriers at the Former Haslar Immigration Removal Centre (known as Haslar Barracks);
  - Feasibility work at Fort Rowner within the HMS Sultan base to generate new employment opportunities whilst identifying additional land for housing to enable the conversion of part of the Fort for economic development;
  - Variety of public realm initiatives to improve the attractiveness of the Borough which can improve the local housing market;

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<sup>11</sup> <https://www.gosport.gov.uk/haz>

- Skills training to help those workers in the construction industry to master conservation building techniques which will be critical for unlocking the conversion potential of many historic sites

### **High Street Heritage Action Zone**

- 4.26 In addition to the main HAZ designation the Gosport Town Centre and Stokes Road Conservation Areas have been designated as a High Street HAZ. Whilst primarily focussing on the economic fortunes of these areas - even more pressing than hitherto given the recent impacts of the Covid19 lockdown - the High Street HAZ offers as yet unidentified opportunities for further residential opportunities above commercial units and in the immediate vicinity of the conservation areas, with the Council keen to identify and work with private landlords to bring such space back into use.

### **Gosport Taskforce**

- 4.27 The Gosport Task Force has been set up to consider the potential growth opportunities that could be realised as a result of the disposal of various public sector sites in the Borough. The Ministry of Defence (MoD) has been gradually consolidating its presence within Gosport over a number of years, following the Borough's historic role as a support base for the Royal Navy. A number of prominent public sector sites in Gosport, currently or previously owned by the MoD or Ministry of Justice (MoJ) are due for disposal over the next few years. Collectively these sites provide an unparalleled opportunity to accommodate a new phase of Gosport's growth, and local stakeholders are keen to maximise the potential of this portfolio of sites to encourage transformative economic development and growth.
- 4.28 The Task Force is chaired by Caroline Dinenage MP and includes representatives from the Borough Council (Councillors and officers), Hampshire County Council, the Defence Infrastructure Organisation, senior officers from local bases, the MoJ, the Solent LEP and One Public Estate. It aims to help facilitate investment in Gosport by looking at ways to remove barriers to delivery.

### **One Public Estate and Government Funding Programmes**

- 4.29 One Public Estate (OPE) is an established national programme delivered in partnership by the Office of Government Property (OGP) within the Cabinet Office and the Local Government Association (LGA). It provides practical and technical support and funding to councils to deliver ambitious property-focused programmes in collaboration with central government and other public sector partners. GBC is currently working with OPE with the aim of finding long-term development solutions to a number of MoD owned sites in Gosport including Blockhouse, Haslar Barracks and HMS Sultan.
- 4.30 The Council will continue to bid for additional funding which can assist in de-risking complex sites in the Borough and ultimately making them more attractive for development investment and overall site viability. This includes the Levelling –Up

Fund which the Council is currently awaiting the outcome of the Round 1 funding process.

### **Social and Affordable Housing Development Strategy**

- 4.31 The Council has agreed to undertake a building programme of new social and affordable housing within the Borough with the initial aim of building 100 houses in the next three financial years, subject to land availability and planning permission. GBC Planning worked with GBC Housing to prepare a list of potential housing sites. This programme was agreed by the GBC Community Board of 22 January 2020 with further revisions in 2021.
- 4.32 GBC Members acknowledged that the proposal would provide much needed affordable houses as the waiting list for those with housing needs was currently over 1000. The Board was advised that the properties would be eligible for right to buy but that subject to the right to buy affordability rules it would potentially not be for 15 years. The Community Board was also advised that there would be specific units allocated to specific disability needs including family sized accommodation that would exempt the properties from being available under the right to buy scheme. It was accepted by the Community Board that difficult decisions may need to be made with regard to the use of any land for the construction of additional properties, but recognised the need for such properties was significant in the Borough.

### **Other GBC Sites**

- 4.33 In addition to the sites identified above further Council sites could come forward for development. This includes further investigations as part of the evidence base for the emerging Local Plan 2038.
- 4.34 Across the GBC area there is also a need to provide an updated strategic approach to car parking provision to ensure that excess capacity can be considered corporately. It is currently proposed that a Car Parking Review will be undertaken within the LPR plan period. The principal of development on certain car parks has been established in the Gosport Waterfront and Town Centre SPD.

### **Brownfield Register**

- 4.35 Local authorities are required to publish an annual list of brownfield sites (previously developed land) in their area that may be suitable for development. The Council has published a Part 1 Brownfield Register which is a list of brownfield sites that are considered suitable for residential development<sup>12</sup>. Part 2 of the Register are sites which have been granted permission in principle. This is a new type of planning permission that approves the principles of development – use, location and scale. There are currently no sites in Gosport which have been granted permission in principle and therefore Part 2 has not been published. The Council as part of any pre-application discussions ask potential landowners of suitable sites whether they wish their site to be added to the Brownfield Land Register (acknowledging the issue of

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<sup>12</sup> <https://www.gosport.gov.uk/article/1215/Brownfield-Land-Register>

commercial confidentially). Inclusion on the site could assist landowners in finding interested developers.

### **Improving Infrastructure**

- 4.36 GBC and other organisations including the Local Economic Partnership, the Solent LEP, and Hampshire County Council (HCC) as the Local Highways Authority, are working on a number of projects to improve infrastructure in Gosport and hence remove barriers to housing delivery.

#### *Gosport Infrastructure Investment Plan*

- 4.37 The Solent LEP has prepared an Infrastructure Investment Plan (IIP) for the Borough of Gosport<sup>13</sup>. This identifies future 'economic infrastructure' needs of the Borough i.e. the infrastructure that is typically required to support the day-to-day functioning of an economy such as transport, telecommunications, energy, water, waste and flood defence and workforce skills. The IIP is intended to support the work of the Gosport Task Force. The IIP has been undertaken at a critical juncture in Gosport's economic evolution due to the proposed MoD and MoJ releases.

- 4.38 It is important that the long-standing infrastructure issues of the Borough has been recognised by the Solent LEP and the Council look forward to working with the LEP to help alleviate some of the issues identified in the document. This recognises a number of overarching investment priorities including:

- Significant investment in flood defences at key regeneration sites such as Blockhouse to enhance their viability for development;
- Renewable energy to help power residents and businesses in Gosport
- Investment in transport improvements including the road network, expanded water-based transport services and an extended Bus Rapid Transit system
- A roll-out of the next generation 5G and full fibre network to enhance the Borough's attractiveness to investors
- Improvement in human capital and skills to increase include marine training

#### *Local Highways Authority*

- 4.39 The Stubbington bypass forms part of HCC's wider plan for improving access to Fareham and Gosport. As part of the plan some schemes have already been delivered including at the Newgate Lane corridor, the Peel Common roundabout, sections of the A27 between Segensworth to Titchfield and at The Avenue/Station Roundabout/Western Way. The Stubbington bypass will improve journey times and reliability on the Gosport Peninsula and help remove barriers to growth and encourage investment and regeneration, particularly at the Solent Enterprise Zone at Daedalus.

#### *Transforming Cities Fund*

- 4.40 The Portsmouth city region – which includes Gosport - lags behind the UK average in Gross Value Added (GVA) (the unit which measures how productive an area is) and

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<sup>13</sup> <http://www.investingosport.co.uk/infrastructure-investment/>

competitiveness. There is a high concentration of 'left behind' places, where poor connectivity is a key cause of poverty, poor health, and reduced productivity in the area. The significant travel and transport challenges within the city region, including Gosport, has caused a negative impact on productivity, air pollution and social exclusion and without significant intervention the trend will continue to get worse. As such complex brownfield sites in Gosport have been more difficult to deliver due to market attractiveness and viability issues which has meant delivery rates have been slower than expected including market and affordable housing.

- 4.41 In September 2018, Portsmouth City Council (PCC) and HCC were one of twelve city regions shortlisted to bid for a share of the Department for Transport's £1.28 billion Transforming Cities Fund. This fund is for public transport improvements across South East Hampshire. The Portsmouth city region's SEHRT proposition unites the three authorities (PCC, HCC and the Isle of Wight Council) and local bus operators in a partnership which together could achieve significant changes in transportation use and unlock the potential of this area by delivering, amongst other social benefits, the enabling of sustainable delivery of housing developments through for example the creation of bus priority corridors across South East Hampshire. Further detail of the SEHRT is set out on their website<sup>14</sup>.
- 4.42 The DfT released two waves of funding for the Transforming Cities Fund. First, shortlisted cities could bid for 'quick wins' - projects that could begin in the financial year 2018/19 and support the overall bid. The Portsmouth City Region bid was successful for the 'quick win' funding, and received the full request of £4.0m from the initial fund. From this, £2.6m was allocated to three junction improvement schemes in Portsmouth and Real Time Information installation at bus stops across Portsmouth, Havant and Waterlooville. The remaining £1.4m was allocated towards delivering the extension of the existing Eclipse bus route in Gosport south from the Hutfield Link to a new junction with Rowner Road – this project is expected to be completed Autumn / Winter 2021<sup>15</sup>.
- 4.43 The Portsmouth City Region bid for funding from Tranche 2 of the Transforming Cities Fund, which again included Gosport, was initially submitted to the Department for Transport (DfT) in November 2019 (with a re-bid submitted in July 2020) with the aim of enabling the next phase of the South East Hampshire Rapid Transit (SEHRT) network. The revised bid was successful, and funding was announced in September 2020, with a total of £56 million being awarded to support a total of 22 schemes across the Portsmouth, Gosport, Fareham, Waterlooville, Havant and the Isle of Wight areas. Out of the total funding allocation, £5.2 million has been allocated to improving Gosport's transport interchange facilities, which includes proposals for the re-location of the bus station, taxi rank and drop-off/pick-up and short stay parking facilities to provide a modern transport interchange. It is also proposed to undertake highway changes including the provision of a bus-only link across the High Street between North and South Cross Street, which will bring bus services into the heart of the Town Centre. Gosport Borough Council will also be providing a financial contributing towards the project.

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<sup>14</sup> <https://www.sehrt.org.uk/>

<sup>15</sup> <https://www.hants.gov.uk/transport/transportchemes/brtphaseII>

- 4.44 Wider improvements to physical infrastructure and enhancement of services are also sought and will be through an on-going dialogue between relevant stakeholders including the Borough Council, HCC and the Bus Company. Options under consideration include the potential for an “E3” bus service, which could utilise:
- Rowner Road to North of Daedalus
  - Military Road, Cherque Way to Daedalus.

#### *Flood Risk Infrastructure*

- 4.45 The Borough Council acknowledges that to sustain future development patterns in Gosport, significant investment in flood defences and flood defence infrastructure will be required. The Coastal Partners published a Coastal Flood and Erosion Risk Management Strategy (CFERMS) for the stretch of the Solent coast from the River Hamble to Portchester in March 2016 and this covers the entirety of Gosport Borough’s shoreline. Of specific relevance to Gosport are Strategy Management Zones 2 (Fareham and Gosport) and 3 (Lee-on-the-Solent and Stokes Bay).
- 4.46 The CFERMS identifies a series of ‘priority areas’ targeted at those areas of this stretch of coastline with the most significant flood and erosion risk and the greatest need for coastal defence works. A number of schemes are identified for each priority area that is considered necessary to alleviate the flood and erosion risk. The strategy notes that in some key areas of Gosport, where defence heights are lowest, there is a significant risk of tidal flooding from the present day. The preferred strategic approach therefore involves a phased implementation of new defences including capital works, softer options (to encourage and build up the existing natural defence, such as vegetation management and planting) and maintenance of existing defences. The strategy also acknowledges that aspirations to redevelop and regenerate parts of Gosport Borough means that new coastal defences have an important role to play in supporting these wider initiatives, for instance at the key development sites Fort Blockhouse and Royal Clarence Yard Retained Area.
- 4.47 Significant flood defence infrastructure is likely to be required on the Haslar peninsula with the precise nature and scale still to be determined. A number of flood defence infrastructure projects have been granted planning permission in the Borough, namely St Vincent College at Forton Lake (planning application 20/00429/FULL, consent granted 14<sup>th</sup> January 2021), and Stoke Lake in Alverstoke (planning application 20/00298/FULL, consent granted 8<sup>th</sup> December 2020). Further proposals for a further scheme at Seafield are currently underway with £227,000 of funding to progress the Seafield scheme to an enhanced outline design stage was secured and the outline designs were the subject of public consultation during spring 2021 and further detailed designs are on-going. Improvements would also be needed to the sea walls on the Solent frontage of Fort Blockhouse to deliver the Regeneration Areas identified in the Local Plan.



## 5.0 CONCLUSIONS

- 5.1 Appendix One sets out a range of short and medium term actions which aim to increase the delivery of new homes in the Borough. It also identifies timescales and responsibilities for delivery of the actions, where appropriate. Monitoring of the actions will be undertaken annually following receipt of the annual HDT measurement (anticipated to be November each year), and the annual review of the Action Plan will draw on information from a range of sources including the annual housing completions surveys (which provides figures for the number of new homes completed each year) and other relevant documents.
- 5.2 In terms of barriers to housing delivery, GBC has identified the following key issues:
- The current suspension of housing consents in South Hampshire due to the Nitrates issue. Progress is being made and it is envisaged that by the end of 2021 a number of consents with suitable mitigation will be issued;
  - Gosport is almost entirely either urbanised or comprising open spaces of strategic importance entirely unsuitable for housing development. Consequently there is a limited supply of sites available for housing and as such the Borough is reliant on a significant amount of housing need being met elsewhere in the South Hampshire sub-region or beyond;
  - Gosport retains significant MoD land holdings the future of which is for either a continuation of military use or potential release for redevelopment. Where MoD land has come forward for redevelopment in the past the delivery of housing on these years takes significant periods of time i.e. a much greater timespan than the three years the HDT is comprised of. The planned release of MoD land is sometimes unclear to the LPA despite constructive and positive working relationships;
  - Sites that are released are extremely complex which affects the overall investment viability. Issues include contaminated land, the need for improved flood defences and neglected heritage assets which require significant investment;
  - Gosport has a significant number of designated heritage assets, primarily associated with the town's naval history, and many of which are on military land or in a poor state or both. The proposed Gosport HAZ aims to conserve these heritage assets with new uses, which could include housing where appropriate, in line with national guidance;
  - Gosport has the lowest jobs ratio (employment to population) in the South East of England and hence there is a strategic need to retain designated employment land for commercial use. As such, the delivery of housing from employment land is likely to be limited.
- 5.3 Despite these issues the Council is content that it is both cognisant of these issues and is working constructively, usually in partnership with third parties, to resolve them with the aim of improving housing delivery. Where necessary actions will be updated, or new actions added in response to currently unforeseen issues or barriers to development, or as a result of changes in government policy, legislation or planning practice guidance. Close working relationships with infrastructure providers, developers and other key stakeholders will be key to ensuring a step change in increasing housing supply locally.



## APPENDIX ONE: GOSPORT HOUSING DELIVERY TEST ACTION PLAN August 2021

Root Causes	Evidence	Action	Who/When	Action achieved
<b>Strategic Issue: Housing Land Supply</b>				
Local Plan Allocation Sites	Some sites in Local Plan have not come forward as planned affecting future housing supply.	<p>Allocations to be reviewed through Local Plan Review.</p> <p>Develop and strengthen our working partnership with Homes England to take advantage of funding opportunities to deliver Local Plan Allocations.</p> <p>Continue working with One Public Estate, Defence Infrastructure Organisation and the Ministry of Justice to deliver public sector owned land for mixed-use.</p>	GBC Planning and Regeneration	<i>Ongoing</i>
Housing Land Supply	<p>Sufficient land to meet Local Plan housing targets but future Gosport requirements will be based on the Government standard methodology which creates a major uplift and step change in housing delivery requirements.</p> <p>Evidence does not identify sufficient land to meet future requirements based on</p>	<p>Prepare Local Plan 2038 and identify new housing allocations (both strategic and non-strategic).</p> <p>Continue work on studies including Strategic Housing Land Availability Assessment (SHLAA) and evidence on market demand.</p> <p>Regular Brownfield Register updates.</p>	GBC Planning and Regeneration	<i>Ongoing</i>

Root Causes	Evidence	Action	Who/When	Action achieved
	<p>government standard housing methodology.</p> <p>Ongoing dialogue between GBC and site promoters to speed up delivery on sites with existing planning permission</p>	<p>The Council has, and will continue to, take a proactive approach to towards working with these external parties to assist in the delivery of these allocation sites to support the future improvement of its housing land supply. This includes both pre-application discussions and post consent dialogue where necessary.</p>		
	<p>Delivering new housing through the re-use of heritage assets</p>	<p>Working with partners to review release of public sector assets for mixed-use regeneration. Implementation of Heritage Action Zone and High Street Heritage Action Zone.</p> <p>Work with landowners to encourage land assembly options and use of surplus sites.</p>	<p>GBC Planning and Regeneration</p>	<p><i>Ongoing</i></p>
	<p>Sites with existing uses</p>	<p>A new GBC Car Parking Strategy.</p>	<p>GBC Streetscene GBC Planning and Regeneration</p>	<p><i>To commence</i></p>
	<p>Potential for residential redevelopment of Council housing stock i.e. obsolete flats, under-utilised GBC land.</p>	<p>Social and Affordable Housing Development Strategy</p>	<p>GBC Housing GBC Planning and Regeneration</p>	<p><i>Ongoing</i></p>

Root Causes	Evidence	Action	Who/When	Action achieved
Progress with Duty to Co-operate and sub-regional Strategic Planning	Requirement for an updated sub-regional strategic (South Hampshire Spatial Position Statement) as there is a need to revise to deal effectively with housing distribution and unmet housing need.	Updated South Hampshire Spatial Position Statement to be undertaken and agreed by PfSH and Local Authorities.	Partnership for South Hampshire South Hampshire Local Authorities	<i>Ongoing</i>
	As of August 2021 no agreed Duty to Co-Operate between GBC and Fareham Borough Council (FBC).	Continued engagement between GBC and FBC to produce a Statement of Common Ground.	GBC Fareham Borough Council	<i>Ongoing</i>
<b>Strategic Issue: Infrastructure</b>				
Strategic infrastructure required to support housing development	Local Plan evidence identifies deficiencies in strategic infrastructure which holds up housing development. This is particularly in relation to transport infrastructure and flood risk mitigation.	Prepare Gosport Local Plan and evidence base including the Infrastructure Delivery Plan which confirms funding sources and delivery mechanism for key infrastructure.	GBC Planning and Regeneration Solent LEP, Infrastructure providers	<i>Ongoing</i>
	Sources of funding will be required to deliver strategic transport infrastructure.	Continued engagement with Transforming Cities Fund and other transport funding with aim of securing funding for strategic infrastructure improvements.	Portsmouth City Council (PCC) and Hampshire County Council (HCC). Infrastructure providers	<i>Ongoing</i>
	Sources of funding will be required to deliver strategic flood infrastructure.	Continued partnership working to determine extent of the flood risk infrastructure needed to deliver	GBC Planning and Regeneration, Coastal Partners	<i>Ongoing</i>

Root Causes	Evidence	Action	Who/When	Action achieved
		the Local Plan 2038 spatial strategy.		
	Sources of funding will be required to de-risk sites to make them more attractive for investment and improving overall viability (such as addressing contamination, site clearance etc)	The Council will continue to apply for external funding such as the Levelling-Up Fund to assist this process	GBC with relevant partners as stipulated in application criteria	<i>Ongoing</i>
<b>Strategic Issue: Development Viability</b>				
Delays linked to s106 negotiations	Delays to determining applications including strategic sites due to negotiations on planning obligations including affordable housing, education and transport.	Ongoing negotiation between Development Management and site promoters.	GBC Planning and Regeneration	<i>Ongoing</i>
Identifying developable sites	Determination of deliverable strategic sites in Local Plan Review	Whole Plan Viability Assessment		<i>To commence</i>
<b>Strategic Issue: Environment</b>				
Nitrates	Effective suspension of housing consents without Natural England approved mitigation.	Produce South Hampshire Environmental Strategy  Create Solent Nutrient Fund and continue third party land offsetting initiative	GBC Planning and Regeneration and other South Hampshire LPAs	<i>Ongoing</i>

