

By email to Michael Gove –  
Secretary of State for Levelling Up,  
Housing and Communities

**Enquiries to:** Jane McEvoy  
**Email:** [jane.mcevoy@havant.gov.uk](mailto:jane.mcevoy@havant.gov.uk)

**Date:** 20 January 2023

Dear Secretary of State,

**The need to ensure that changes to the Levelling Up and Regeneration Bill deliver meaningful reform of the standard method**

I would like to first and foremost congratulate you on your return as the Secretary of State for Levelling Up, Housing and Communities. You have inherited a set of challenges that are key to moving this Country forward, at pace, in the correct direction. I wish you the best in your endeavours and stand ready to assist you in meeting those challenges.

Firstly, I want to welcome much of what has been set out in the Levelling Up and Regeneration Bill and the Government's proposed approach to updating the National Planning Policy Framework, which will deliver much needed positive reform in housing and brownfield regeneration. However, I do want to highlight a concern that has been raised by many of my colleagues in local government, which is the retention of the 'standard method' for calculating housing need in its current form.

We are in the early stages of developing a new Local Plan for the Borough at pace which must address these challenges. I would like to particularly thank your department for providing a funded support package for Havant Borough Council, recognising the desire of the authority to get a plan in place. Whilst this work has not yet been fully completed, I understand from my officers that this has been a positive approach and experience to date, and so I am thankful for Government's support in the plan-making process.

Havant is an authority that prides itself on welcoming regeneration and economic growth. The Local Plan is one of the key priorities of the authority and our Corporate Strategy. We want to see thriving town centres, new jobs and a Havant which fulfils its significant potential. None of this is possible without an up-to-date local plan.

However, Havant is a small, constrained, coastal local authority. Suburban expansion, particularly in the second half of the 20<sup>th</sup> Century, has meant the Borough has expanded to the edge of its 1974 borders. Our ability to accommodate additional development is severely limited and any sites in the Borough are heavily constrained and require extensive up-front analysis in order to allocate in a plan, or for developers to submit robust planning applications.

The standard method which is to be retained in the draft NPPF is far too blunt a tool for assessing housing need. For constrained authorities such as Havant it represents not just a challenge but an impossibility. Whilst the reference of the standard method as 'an advisory starting-point' for establishing a housing requirement for the area in the new NPPF is welcomed – there is a need to provide clarity on what is meant by 'exceptional circumstances' in which an alternative approach to assessing housing need may be justified. Clearly the policies in the Framework, and specifically those in footnote 7, many of which relate to the physical and geographical constraints of an area directly affect an authority's ability to identify sufficient sites for housing delivery. Pursuing an alternative approach to assessing housing need without first having the reassurance that such constraints could be taken into account would come with significant risk. As such, as part of the portfolio of documents available for consultation at this time, an update to the standard method should be undertaken, reflecting the prevalence of footnote 7 constraints in an authority's area.

The various reforms of the past decade have shown that separating the calculation of need, national economic policy and the ability to supply new homes into the market simply does not work. It does not assist in getting local plans in place and sustainable development delivered on the ground. As you know Havant does not shy away from promoting economic growth and regeneration, but despite this has struggled to deliver the number of homes required under the standard method since its introduction.

With the proposed reforms to national planning policy, there is now a great deal of uncertainty about how plans should be progressed before the reformed plan-making system is introduced. Whilst there are transitional arrangements for plans to be submitted under the old system, Havant would wish to adopt a new style plan to ensure it has longevity and can be as effective as possible in providing certainty for our residents, businesses and development industry. But the reformed plan-making system is not intended to be introduced until late 2024.

Havant cannot delay moving forward with the local plan, but the proposed reforms incentivise us to do so. Any delay to our Local Plan continues to put us at the risk of speculative development, which I know is not the desire of anyone in Government.

In addition, I would welcome your officials' early engagement with constrained areas such as Havant, explaining how we can use our Local Plan process to outline the constraints we face and, how in turn, that can be used to reduce our overall housing numbers.

I look forward to working with you to ensure that we can achieve the development and regeneration gains that are needed to drive our country forwards.

Yours sincerely

*A Rennie*

Cllr Alex Rennie  
Leader of Havant Borough Council

Cc'd to:

- Alan Mak MP (Member of Parliament for Havant)
- Flick Drummond MP (Member of Parliament for Meon Valley)