



HART LOCAL PLAN STRATEGY AND SITES 2016-32 EXAMINATION
HEARING STATEMENT - MATTER 6 AFFORDABLE HOUSING

On behalf of:
Wilbur Developments Ltd

Respondent ID: 124

Date:
October 2018

Reference:
LR/06014/LP Examination Matter 6

1.0 Introduction

- 1.1 This statement is prepared on behalf of Wilbur Developments Ltd in relation to **Matter 6 – Affordable Housing** and provides their response to **Question 6.2** raised by the Inspector, which asks whether the proposed housing requirements will deliver sufficient affordable housing to meet identified needs.

2.0 Affordable Housing Need

- 2.1 Wilbur Developments Ltd consider that the proposed housing requirement will not deliver sufficient affordable housing to adequately address identified needs, and for this reason will fail to meet one of the basic requirements of a sound plan by reference to paragraph 50 NPPF.
- 2.2 The 2016 Strategic Housing Market Assessment (SHMA) identified the future need for affordable housing in Hart as a more significant issue than the estimate in the previous SHMA in 2014. The Affordable Housing Background Paper (AHBP) identifies that there will be a shortfall of 306 affordable homes in Hart every year until 2032¹. In order to meet the total estimated affordable housing requirement to 2032, the total housing requirement would need to be close to double the OAN of 382dpa identified by the SHMA². As the housing requirement of 388dpa proposed by the Plan is similar to the OAN, it is evident that it will do little to resolve this shortfall so that the draft plan ducks the challenge identified by the 2016 SHMA and AHBP.
- 2.2.1 The 2016 SHMA identifies a 'policy-off' objectively assessed need of 382dpa. Although the market signals uplift incorporated in the OAN had regard to *inter alia* the degree of affordable housing need in the area "*this uplift was made on the basis of a narrow consideration of the impacts relating to the overall calculation of affordable housing*" (AHBP, paragraph 2, page 1) and the SHMA left "policy on" considerations to the individual councils. Accordingly, achieving the OAN figure alone would do little, if anything, to address the unmet affordable housing needs in the area.
- 2.3 In recognition of the extent of the affordability issues in the district, and the advice of the NPPF and the Planning Practice Guidance³, HDC considered applying an uplift to the housing figures to deliver more affordable housing. The results of this analysis are set out with clarity in their Affordable Housing Background Paper, March 2017. While it was not considered appropriate to deliver the entire shortfall, the AHBP did consider it appropriate to increase the housing requirements by approximately 30% from the OAHN figure of 372dpa to 485dpa so that it could deliver 194 new affordable homes each year (63%

¹ AHBP, paragraph 2.2

² The AHBP identifies that a housing requirement of 750dpa would meet all the identified affordable housing needs in the District (AHBP, paragraph 4.8)

³ Paragraph 029, Housing & Economic Development Needs Assessments, Reference ID: 2a0029-20140360, Planning Practice Guidance.

of affordable need) and "enable the Council to meet in full the estimated need for subsidised rented housing, which is particularly relevant given the local policy drivers established by HDC's housing strategies" (paragraph 5 page 2). Taking into account the absence of constraint and the likely positive social and economic effects (paragraph 6.7, page 48), these recommendations were adopted by the Regulation 18 Plan, which proposed an uplifted housing requirement of 485dpa.

- 2.4 In the pursuit of a significantly reduced housing requirement through the Submission Plan, HDC have turned their backs on the specific recommendations of the AHBP and paragraph 50 of the NPPF 2012 and their previous ambition to meaningfully address the affordable housing need in the area. The reduction in the requirement is not driven in anyway by a change in the OAHN or the identified needs of the District, but by the decision of the Council to remove the "policy on" uplift to address affordability issues.
- 2.5 It might be thought that the current proposed requirement, based on a 40% policy requirement, could generate circa 155dpa of affordable housing. This would be to meet only half of annual affordable housing shortfall in the District. However, even this figure is extremely unlikely to be achieved in practice because not all sites will deliver the policy requirement of 40% affordable housing. In particular the key allocation in the Plan – that for 1,500 dwellings at Hartland Village – will deliver only 20% affordable housing⁴ (half the proposed policy requirement).
- 2.6 In reality, unless the Plan reverts to the requirement that was demonstrated to be acceptable in the Regulation 18 version, there will be a very substantial and socially harmful under provision of affordable housing throughout the life of the Plan. This is a clear breach of central government policy of long standing and would result in a manifestly unsound plan.
- 2.7 Neither the Plan nor the Housing Topic Paper provide any justification for departing from the recommendations in the AHBP to add a 'policy-on' adjustment to the OAN in order to address some of the affordable housing need in the area. Although, the Housing Topic Paper recognises that there is a "large need for affordable housing" and says that the 25% uplift from the local housing need would help address this, this token gesture ignores entirely that, even with the uplift of 25% (which gives the figure of 388dpa) the Plan's ability to meet affordable housing needs is considerably worse than the Regulation 18 version/as recommended by the AHBP.

3.0 Proposed Changes

- 3.1 To ensure that the housing requirement will deliver enough affordable housing to make a meaningful contribution to meeting the needs identified by the Plan's evidence base, it should be increased to a level consistent with that recommended by the AHBP and proposed by the Regulation 18 Plan. To achieve

⁴ Planning Permission Reference: 17/00471/OUT

this, the housing requirement should be increased from 6,208 dwellings to a minimum of 7,760 dwellings (see statement in relation to Matter 3).