



MATTER 6 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

AFFORDABLE HOUSING



This Statement for Matter 6 will seek to address the Inspector's Questions identified below:

Affordable Housing Need

- Has the Council's affordable housing need been robustly calculated, in accordance with national policy?
- Will the proposed housing requirement deliver sufficient affordable housing to meet identified needs?

Policy H2

- Is Policy H2 justified and consistent with national policy?
- Is the requirement for no less than 40% affordable housing justified and based on a sound assessment of viability?
- Policy H2 requires developments of 11 dwellings or more to make provision for 'no less than' 40% affordable housing units. Will the Council therefore seek more than 40%? If so, under what circumstances?
- Is Policy H2 justified, insofar, that it applies to specialist housing? Is this viable?
- Are criterion d) and e) based on a sound assessment of viability and are the thresholds justified?
- Who will be responsible for collecting the evidence required under criterion e) of Policy H2?
- Paragraph 179 of the Plan refers to affordable homes being 'restricted for use by future eligible households'. Is this justified? If so, should it be set out in Policy H2 rather than in the supporting text?

Policy H3

- Is the threshold of at least 70% of rural exception sites being affordable units justified?
- Paragraph 192 of the Plan refers to rural exception sites being up to '20 dwellings', is this justified and consistent with national policy?
- Is reference to the use of compulsory purchase powers in Paragraph 189 appropriate?



Matter 6 – Housing: Affordable Housing

Introduction

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property North Hampshire (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within the district of Hart.
2. On behalf of European Property Ventures North Hampshire (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period.
3. Yateley is second largest settlement in the district away from SPA Zones according to the settlement hierarchy however no housing allocations have been proposed in the Local Plan in Yateley other than existing commitments. The site at Eversley Road site, owned by EPV, was a previous draft allocation SC5 for 80 dwellings. The allocation was removed from the Local Plan due to the lack of strategic SANG available within the District and at Yateley, particularly with there being no intentions to allocate further strategic SANG in the emerging plan. The IDP identifies that 5.1Ha of SANG is being delivered at Yateley through an appealed residential scheme, but the LPA has already utilised any excess SANG provision to make up for the current shortfall in provision. Hindering any further growth at Yateley to meet new housing requirements from any sector of the community.
4. The fact that the HC5 site was previously allocated demonstrated that there was no need to retain a gap beyond the western boundary of Yateley to prevent coalescence and that development at this location was acceptable. It is the view of Claremont Planning that the identified settlement boundary for Yateley is therefore not justified and should be expanded to the west to accommodate the Eversley Road site. This is also justification for paragraph 103 of the Plan that states that settlement boundaries will be reviewed through a future Development Plan Document. It is somewhat unreasonable to adopt a plan on the grounds that such a critical matter such as settlement boundaries will need to be reviewed before the next plan period.
5. In order to overcome the environmental SANG concerns the land owner has sought to provide a solution to SANG and this is set out in detail in the Examination Statement relating to matter 12 – Environment. This, alongside the other sites being promoted by CEMEX and Gawthorpe Estates include substantial areas of SANG, will be able significantly increase the SANG capacity not of only Eversley and Yateley, but also for the District as a whole.
6. It is demonstrated that the Plan's failure to provide for the accounted local needs of its communities and deliver sustainable development in accordance with the National Planning Policy Framework to delete the draft allocation SC5 at Eversley Road, Yateley. The site is available, viable and deliverable and could accommodate 100-120 dwellings alongside



provision of open space links and funding toward onsite and offsite SANG where available, such as that being promoted by CEMEX and Gawthorpe Estates.

7. The reliance upon approved permissions instead of actively allocating new sites and settlements identify a diversion away from a plan-led approach that is contrary to the NPPF and the purposes of the planning system.
8. In terms of affordable housing Claremont Planning are generally supportive of the policies set out at H2 and H3. However, we are opposed to the proposed housing requirement to deliver sufficient affordable housing to meet identified needs and are concerned that this has not been robustly calculated. The overall housing allocations are insufficient for the District and therefore the affordable housing projections are also insufficient.
9. Forming part of the development strategy of the emerging Plan is the unjustified reliance on the delivery of windfall development in the District as well as the realisation of allocations made through Neighbourhood Plans. Whilst this should always form part of a robust strategy to ensure that numbers are delivered to meet the identified need within a Local Plan, the emerging Plan of Hart District Council inappropriately attributes weight to the delivery of these sites. Firstly, the requirements of the Plan to deliver specialist housing, such as extra care accommodation and custom homes will either constraint the development windfall sites or is not viable to deliver these sites given that they are of a small scale. Windfall sites will not be able to fully deliver the requirement of these policies without jeopardising their delivery to the extent that the strategy requires. This also relates to affordable housing and sufficient amounts of affordable housing cannot be met by reliance on windfall sites and neighbourhood plan allocations to deliver an adequate quantum of affordable units.
10. Furthermore, given that Neighbourhood Plan allocations are designed to provide development to meet the local need of the Parish, the policy of the Local Plan to ensure delivery of affordable dwellings would be inappropriate to apply to such allocations and subsequent development proposals. Whilst the Plan identifies two strategic sites, which will most likely be able to deliver a large number of affordable units, given that the Plan over relies on the delivery of these sites this will result in an over concentration of affordable housing at one certain spatial point of the District. Rather, the spatial strategy should seek to distribute development across the Council area, this will result in the provision of a more evenly distributed affordable units throughout the District rather than concentrated to one location at provided throughout the plan period rather than toward the end. The strategy as proposed will not address the current housing needs of existing communities and as a result will fail to meet the needs identified in its evidence base, resulting in an unjustified strategy.
11. The delivery of an adequate number of affordable units is inextricably tied with the viability of a site's development. As the Plan is overly reliant on windfalls and Neighbourhood Plan allocation coming forward, the stipulation of policies regarding affordable housing provision will detrimentally impact on the viability of these sites in being delivered. This is especially pertinent to windfall sites which are by nature smaller and non-strategic in size. This undermines the ability of the Local Plan to effectively seek development to meet the specialist need of the District as well as provide sufficient affordable units for the growing population.
12. The site at Eversley Road (SHLAA 273-272 and draft allocation SC5) is ideally located immediately adjacent to the settlement boundary. A series of technical reports were prepared supporting development at this location including ecological surveys by the Council's



consultants. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBHSPA at all other locations. The failure to identify this site means that the insertions of paragraph 29-30 are incorrect and the Local Plan policy has failed to account for a new SANG and suitable level of housing growth at Yateley, which is best placed to contribute to cross boundary housing and environmental requirements. As such, it was unjustified to remove this site from the draft allocations when the Local Plan is suggesting a fairly low number of new homes across the plan period.

13. It is the view of Claremont Planning that the figures suggested in the HMA are too modest and that reference to the requirement for a new settlement undermines the findings of this evidence document. The emerging plan should instead provide housing land allocations across the borough to meet the required more realistic quantum of housing development. It is therefore suggested that the SC5 site at Eversley Road is reinstated to assist in accommodating future housing needs and also aiding the delivery of strategic SANG that will address longstanding deficiencies at Yateley and serve to provide an environmental strategy for the settlement into the future and past the plan period. The SC5 site at Eversley Road was ideally located immediately adjacent to the settlement's western boundary.
14. The Local Plan proposes a low number of homes to be delivered to 2032 however, they state that they accept future requirements will be higher and that a new settlement will be necessary and will be delivered within the plan period through a separate DPD. The Council are therefore acknowledging that more houses are required than they suggest but they have no definitive plans for this New Settlement and yet they have deleted a highly sustainable draft allocation for at least 100 dwellings at Yateley.
15. On behalf of European Property Ventures North Hampshire (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period. The previous draft allocation SC5 should be reinstated with the adjacent Eversley gap identified as search area for the provision of strategic SANG.
16. The SC5 site was previously a draft allocation in the regulation 18 consultation and was therefore previously considered suitable for development. A series of consultant reports were prepared supporting development at this location. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBHSPA at all other locations. It is unjustified to remove this site from the draft allocations when the Local Plan is suggesting a restricted number of new homes across the plan period. The Local Plan proposes a low number of homes to be delivered to 2032 at existing settlements, although recognising that future requirements will be of a much higher level sufficient to justify a new settlement. The Council are therefore acknowledging that more houses are required than they suggest but they have no definitive plans for this New Settlement and yet they have deleted a highly sustainable draft allocation for 100 dwellings at Yateley.



17. Claremont Planning therefore request that the policy is amended to include all criteria set out by Natural England, which clearly states that 2ha is a sufficient space for SANG to operate successfully. The SC5 site could deliver a highly sustainable form of development with onsite SANG or contribute to the provision of a wider strategic SANG within the Eversley Gap, so the SANG could therefore act as a buffer preventing any perceived coalescence of settlement. This would function coherently with the sites being promoted at Eversley and Eversley Cross by CEMEX and Gawthorpe, which together will contribute towards a more robust strategic gap, but also contribute towards a substantial increase in the SANG capacity of Hart District.
18. It is suggested that the site at Eversley Road is reinstated as a housing land allocation which can come forward for development sooner than a proposed new settlement on land that is yet to be identified and acquired and therefore it seems unrealistic to assume the new settlement can be delivered in the next 5 years. The SANG proposed in the masterplan meets with the requirements of Natural England and our client is considering the possibility of providing additional SANG on an adjoining site.
19. Claremont Planning have demonstrated that the plan cannot be found effective, sound or legally compliant without further modification given the inadequacies surrounding the identification of strategic growth locations.

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