

HART DISTRICT LOCAL PLAN: STRATEGY AND SITES (2016-2032)

HEARING STATEMENT

MATTER 6: AFFORDABLE HOUSING

ON BEHALF OF LIGHTWOOD LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Alexander James Bullock

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasuspg.co.uk

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of Lightwood Land in respect of the Hart District Local Plan: Strategy and Sites (2016-2032). This Statement seeks to respond to the questions raised by Mr Jonathan Manning (Inspector) in relation to Matter 6: Affordable Housing.
- 1.2 Lightwood has a major contractual interest in the identified Area of Search (AoS) for a new settlement at Murrell Green/Winchfield that is identified as part of Hart District Council's (the Council's) Vision and Objectives and under Policies SS1 and SS3.
- 1.3 Pegasus Group, acting on behalf of their client, have made representations on the emerging Local Plan at the Regulation 18 and 19 stages. Our responses to the questions and issues raised should be read in conjunction with these representations and the associated evidence base for the AoS.
- 1.4 These representations have been considered against the tests of 'Soundness' as defined by Paragraph 182¹ of the National Planning Policy Framework (NPPF) 2012.
- 1.5 This Hearing Statement has been prepared in consultation with Gallagher Estates, the promoter of the Winchfield component of the AoS, as part of the on-going collaborative approach to the promotion and delivery of the future new settlement.
- 1.6 Pegasus, on behalf of Lightwood, wish to take a full and active part in the hearing session on **Tuesday 11th December 2018** in relation to all parts of Matter 6. Our responses to the questions and issues raised our set out within the remainder of this Statement.

¹ Previously Paragraph 35 of NPPF 2018

2. HEARING STATEMENT

2.1 Within this section of the Statement we identify the relevant question/matter and provide our response within the subsequent paragraphs. All references are consistent with those provided in the 14th September 2018 set of questions.

6.1 Has the Council's affordable housing need been robustly calculated, in accordance with national policy?

2.2 Yes, the Council has calculated the affordable housing need robustly in accordance with national policy.

2.3 National Planning Practice Guidance (Paragraphs 021-025) concerning affordable housing sets out that planning authorities will need to estimate the current number of households and the projected number of households who are unable to own or achieve their housing needs.

2.4 This calculation should seek to establish the unmet need for affordable housing by assessing part trends and current estimates of:

- the number of homeless households;
- the number of those in priority need who are currently housed in temporary accommodation;
- the number of households in over-crowded housing;
- the number of concealed households;
- the number of existing affordable housing tenants in need;
- the number of households from other tenures in need and those that cannot afford their own homes, either to rent or to buy.

2.5 Lightwood are satisfied with the Council's evidence base in this regard and the associated recognition that this generates an annual need of 306 dwellings as set out in the Council's Affordable Housing Background Paper (HOU5).

6.2 Will the proposed housing requirement deliver sufficient affordable housing to meet identified needs?

- 2.6 No, Lightwood consider that the proposed housing requirement will not deliver sufficient levels of affordable housing based on the Councils evidence.
- 2.7 However, Lightwood does not consider that there is a need to uplift the Council's sound housing requirement. The identification of the AoS now provides a supply boost to the delivery of affordable housing over and above the requirement figure.
- 2.8 It is Lightwood's understanding that the Council intends to (based on Cllr Cockarill's address to Hart's Full Council on 27th September 2018) revert to the SHMA calculated OAHN figure as opposed to proceeding with a figure calculated by the standard methodology. Accordingly, the Council will proceed with a figure of 382 dwellings per annum.
- 2.9 The Council's Affordable Housing Background Paper (HOU5) is of relevance. This paper identifies a shortfall of 306 affordable homes in Hart every year until 2032. Given that affordable housing is delivered as a percentage of market housing, to meet the full affordable housing need annually would require a significant increase in requirement.
- 2.10 Lightwood is not suggesting that the Council should adjust to meet the need of the entire shortfall of affordable housing as it is for the Council to decide what level of uplift it should take as part of a 'policy on' decision as part of a wider planning judgement.
- 2.11 However, it must be noted that an annual requirement of 382 dwellings will deliver 152 affordable dwellings per annum (assuming 40% affordable housing delivery). This figure would be boosted on annual basis with the AoS from the middle of the plan period as the AoS would deliver a policy compliant 40%. This compares favourably from existing consents such as that at Hartland Park which as consented will only deliver 20% and thus mean the Council are 50% behind target as a result.
- 2.12 However, Lightwood note that in the identification of the AoS the Council is seeking to increase its land supply, and therefore affordable housing delivery, during the latter part of the Plan period.

- 2.13 The promoters of the AoS are committed to delivering 40% affordable housing in line with the Council's affordable housing policy. On the basis that the AoS will deliver a new settlement in the order of 5,000 dwellings, then this would provide a boost of around 2,000 houses which is equivalent to 6.6 years' worth of affordable housing need in the long term.
- 2.14 As such whilst the Council are not looking to increase their requirement they are putting other measures, in the allocation of the AoS, in place now.

6.3 Is Policy H2 justified and consistent with national policy?

- 2.15 No, Policy H2 is not fully justified and consistent with national policy. However, there are only a small number of instances where it should be revised.
- 2.16 At the time the Plan was prepared it was consistent with the thresholds set out in the Planning Practice Guidance. However, Paragraph 61 of the NPPF 2018 has clarified the instances where the provision of affordable housing should be sought. Namely:

"Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set a lower threshold of 5 units or fewer)."

- 2.17 Major development, as defined by the Town and Country Planning (Development Management Procedure) (England) Order as being 10+ units with site area over 0.5ha or a floorspace of 1,000sqm and sites over 1 hectare.
- 2.18 Accordingly, the opening paragraph of Policy H2 needs to be adjusted to meet this criterion.
- 2.19 Lightwood is satisfied that the remainder of the policy has been justified and is consistent with the Council's evidence base.