

LPP2 EXAMINATION TOPICS

12th July 2016 hearing. Comments by John Hayter, resident of Bishops Waltham

Respondent 408914723

Matter 2:

i) Does the Plan demonstrate that there will be a deliverable supply of developable new housing and employment land in appropriate locations over the plan period, with suitable infrastructure provision, in accordance with the NPPF/PPG and LP Part 1 ?

A. Market and Affordable Housing Provision

- LPP2 contravenes Reg 8(2) by failure to use adequate, up-to-date and relevant evidence. Is thus breach of NPPF158 by not planning to meet the full, objectively assessed needs for market and affordable housing" and lack of 5 year housing supply are breaches of NPPF47 rendering LPP2 in breach of NPPF182 and hence unsound.

- AMR 2015 Table 17 gives 5 year housing supply requirements of about 3,500, about 700 pa. Affordable housing (AH) completions have been 2012/13 68, 2013/14 149, 2014/15 82 (large sites only) an average of about 100pa with no upward trend and thus a rate of only 14% pa. **The Plan provides no AH trajectory and thus cannot demonstrate requirements are being met and the available evidence suggests it is extremely unlikely.**

- PPG para 029 Ref ID:2a-029-20140306 states "An increase in the total housing figures included in the local plan should be considered where it will help deliver the required number of affordable homes." This guidance has not even been considered because the AH number needed has not been identified. With only 14% 3 year average delivery the increase in housing OAN to solve delivery or even help must be substantial and readily assessable by sensitivity testing per PPG 015-021.

- NPPF 23 requires the allocation of sites for town centre expansion. The planned increase in local populations in rural settlements will require additional town centre parking and more local employment infrastructure if residents are to be encouraged to avoid non-sustainable travel to distant locations. The settlement policies do not provide for this and there is the risk of double counting with the housing provision.

B. Carbon Footprint Reduction Infrastructure

Under Matter 1 the following NPPF non-conformances have been identified:

- NPPF 9 identifies 5 *positive improvements* that constitute sustainable development but not fully implemented.
- DM15 (vii) is the only settlement wide LPP2 policy reference that in any way meets the NPPF 94 requirement to *mitigate* as well as *adapt* to climate change.
- DM14 and DM15 taken together make maximising energy efficiency always subservient to conserving or enhancing the character of development contrary to NPPF93.
- WIN1 (iv) *encourages* sustainable transport options and (v) a *contribution* towards reducing carbon emissions but sets no objective approve/refuse standard to enable it to be delivered.
- DM16 (site Development Principles) at (iii) *includes adequate provision for surface water drainage and sewage disposal* . The requirement of NPPF94 to mitigate as well as adapt to climate change impacts on water supply is not met.
- NPPF 47 requires setting out a local approach to housing density. This has not been done for new housing development or arising from change of use for any whole or part of any of the settlements. This is the largest contributor to mitigating the carbon footprint and improving the vitality and wellbeing of communities as required by NPPF17.
- WIN3 *Views and Roofscape* effectively rules out more than about 3 storey development and all solar energy collection contrary to NPPF94.
- Contrary to NPPF94 there is no district wide policy to reduce out-commuting carbon footprint from every settlement.

ii) Is there clear evidence suitably demonstrating how and why the allocated sites were selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service providers and other interested parties?

- LPP2 2.28 sets out clearly how allocated sites were selected resulting in allocation of defined areas of land to provide LPP1 defined numbers of dwellings and hence a gross and net density that is not defined and hence not consulted on.

- Development density has to conform to NPPF 47 and thus has to be a *local approach* site selection criterion that potentially will be different for every site.
- Solar and other renewable energy provision is required by NPPF 94 on every site to mitigate carbon footprint and climate change. The extent to which this potential should be restricted by impacts on built and natural character in and surrounding the sites has not been considered and hence also not consulted on. This too will potentially be different for every site.
- Individual site policies require provision of affordable housing (AH) but do not specify the number. This makes it impossible to define the district's total supply to compare with the total need. It also makes it impossible for a developer to define the number and type of market housing to make the overall development viable. Instead the LPA and developer take the number allocated as fixed and negotiate the viable AH provision within that instead of making the AH requirement fixed and negotiating the overall housing number to make it viable.
- NPPF159 requires housing plans to address the need of different groups and cater for the demand and scale of housing to meet it. The scale of such as provision for older people with a warden and self-build and the need to distribute the provision across the whole district means these needs can only be met by including the requirements in appropriate site allocations.
- Market housing also has to include some affordable to first time buyers but this is not provided for in general or site specific policies. Provision should be made for construction including self-build staged over a number of years where the first stage is unusually small but habitable. The alternative is often a caravan in the garden.

iii) Does the Plan deal appropriately and sustainably with the likely development needs of the smaller villages and rural area ?

- Not sustainably
- The borders of these are prime locations for renewable energy generation by solar, biomass and wind power. As a minimum each location should generate enough renewable energy to offset the relatively high carbon footprint of the in and out travel inherent in such locations and where possible an excess towards the district's contribution.

iv) Should the Plan address contingencies/alternatives, including in relation to the site allocations, in the event that development does not come forward as expected?

- Yes. It is a requirement of Reg 8(2), NPPF47,158 and 159 to *meet the full, objectively assessed needs for market and affordable housing and to take full account of relevant market and economic signals*. Reg 8(5) provides a procedure to enable modifying the core strategy but the need to use this resource demanding and lengthy procedure can be avoided by providing some contingency to be called on as needed.

- The big uncertainty in the projections is the future trend in the currently rising in-migration that is likely to increase the homeless and overcrowding numbers. Together with further house price rises and perhaps continuing failure to provide sufficient AH the market and economic signals are all pointing to the need for more than the 12,500 allocations in LPP1 and LPP2.

- PPG para 029 Ref ID:2a-029-20140306 states "*An increase in the total housing figures included in the local plan should be considered where it will help deliver the required number of affordable homes*". PPG advises use of sensitivity testing to determine the change required.

- The market signals for a housing increase are almost certain to be stronger in Winchester than elsewhere. These can only be corrected by increased development in or within good sustainable travel distance of Winchester. The distribution of development around the district is only optimal when the market signals are similar in all of the settlements.