

## Issue 4 – Housing – Policy CP2 – CP7

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

### ISSUE 4 HOUSING – POLICIES CP2 – CP7

**i) Is policy CP2 reasonable and realistic and does it provide sufficient flexibility, if viability is an issue for a particular scheme?**

1.1 Policy CP2 is broadly supported as it reflects national policy and local evidence. However it should be revised to make specific reference to the viability of development in informing the overall housing mix, allowing greater flexibility to respond to economic circumstances, as advocated by the NPPF. Viability is a key element of deliverability particularly on large strategic sites.

**ii) Is the threshold and percentage for affordable housing in policy CP3 justified by up-to-date, clear and robust, local evidence of housing needs and economic viability, and does it provide sufficient flexibility, if viability is an issue for a particular scheme?**

1.2 Whilst it is acknowledged that there is a high level of need for affordable housing, as supported by evidence, there is a balance to be struck to ensure an appropriate level is set that does not undermine the viability of development schemes and prevent delivery. Paragraph 1.74 of the NPPF recognises this requiring plans to have regard to economic circumstances.

1.3 As noted above viability is a key element of deliverability on large strategic sites. Whilst policy CP3 does refer to viability factors this is not the case in other parts of JCS where the level of affordable housing provision is stated e.g. Policy SH1. The flexibility within policy CP3 should also be incorporated within Policy SH1. (See further comments under Issue SH1, (Paragraph 1.19))

1.4 We would also question whether the 40% figure is appropriate and reasonable, particularly during the early part of the plan period when the current economic circumstances will continue to prevail, and if there is not a more appropriate and flexible solution. For example it can be noted that policy 12 of the South Hampshire Strategy October 2012 suggests that *'authorities strive for 30-40% of new houses on development sites across south Hampshire to be affordable, subject to maintaining the viability of the development'*

1.5 A target of 30% is a more realistic target for North Whiteley, as supported by the North Whiteley viability appraisal, anything above this in the current economic conditions is extremely challenging.

1.6 It should be realised that by relaxing a requirement that is based on genuine evidence regarding viability is in line with national policy and would not set a precedent for all forms of development. Further, on larger sites there is scope to adjust to circumstances through a phased review of viability. See further comment on viability in response to Issue 6 (Policy SH3) Q2.

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- iii) **Is policy CP4 clear and consistent with national guidance and does it establish appropriate, realistic and reasonable criteria?;**
- ii) **Is policy CP5 [Gypsies and Travelers] clear and consistent with national guidance and does it establish appropriate, realistic and reasonable criteria? and**
- iii) **Are policies CP6 and CP7 consistent with the NPPF and/or justified by clear and robust evidence and appropriate to meet local needs for open spaces, services and facilities?**

No comment