



Strategic Planning & Research Unit

For and on behalf of
MLN (Land & Properties) Ltd

Examination of Swale Borough Local Plan Part 1
Representations to Inspector's MIQs Hearings
Matter 7

Representor ID: 878621

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Strategic Planning & Research Unit

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by the Strategic Planning & Research Unit (SPRU) of DLP (Planning) Ltd (DLP) on behalf of MLN Land & Properties.
- 1.2 This representation has been made in the context of our client's interest in Land East of Scocles Road, Isle of Sheppey, and follow substantial representations made throughout the Local Plan preparation process. The site has not been included within the housing trajectory, but was identified as SW/133 in previous SHLAA assessments. The site was allocated as a 'reserve site' in previous versions of the Plan.
- 1.3 As requested by the Inspector these representations are structured to respond to the specific questions set out in the Inspector's MIQs note, which covers all remaining matters for the examination.

2.0 MATTER 7 – HOUSING MATTERS

7.1 Is the approach to requirements for affordable housing in terms of the percentages sought and the tenure consistent with national planning policy and with the up to date SHMA?

- 2.1 We support the proposed policies in the submitted Plan and proposed Main Modifications with regard to the quantum of affordable housing required within the Plan period.
- 2.2 However we do not consider the selection of sites and spatial strategy within the proposed / modified Plan has adequately taken into consideration the need to deliver affordable homes as set out in the NPPF.
- 2.3 It is clear within paragraph 159 of the NPPF that a SHMA should address the need for all types of housing, including affordable. Furthermore paragraph 47 and the subsequent bullet points state that local authorities should ensure Local Plans meet the full OAN for market and affordable housing; by using their evidence base.
- 2.4 We acknowledge that paragraphs 173, 174 and 175 of the NPPF state that to ensure viability the costs of any requirement (such as affordable housing) within a Plan should be taken into consideration when specific requirements in policies are set.
- 2.5 The approach taken by the Council, with particular regards to the Isle of Sheppey is that there is no requirement for affordable housing; due to viability constraints.
- 2.6 Numerous references are made to deprivation and the need for regeneration on Sheppey throughout the Plan, within Policy ST 6 it is specifically referenced to reduce levels of deprivation in the most deprived wards. A clear way to achieve this would be through the delivery of affordable homes.
- 2.7 Main Modification 79 does not set out that the delivery of affordable housing on Sheppey as a specific objective or aim of the Plan, this is a clear soundness failure to be in accordance with National Policy.
- 2.8 It is perceived that through the viability evidence base, Local Plan housing allocations and Policy DM 8 (Affordable Housing) that no amount of affordable housing will be delivered on Sheppey during the whole plan period. Again this is a clear soundness failure; compliance with national policy (NPPF paragraph 47).
- 2.9 The currently omitted site (SW133, Land East of Scocles Road) has been considered by the Council for allocation, however it has not been allocated for reasons the Council set out in their most recent Sustainability Appraisal document.
- 2.10 The most recent document fails to consider the role that SW/133 can play in meeting the affordable housing need for Swale and in particular on Sheppey; where currently the Plan does not require any affordable housing.
- 2.11 The delivery of affordable housing is clearly a positive effect upon the sustainability of an area; this positive effect is amplified when other housing allocations in the area propose no affordable housing.
- 2.12 We do not consider the Council has adequately appraised a strategy for Sheppey / Minster that would seek to address affordable housing need over the Plan period.

The strategy and the alternatives considered by the Council have not at all considered how affordable housing need can be met.

- 2.13 Within the SA addendum affordable housing is considered within the wider objective of housing. However at page 52 it is stated that this objective would not be appropriate to appraise as no data exists. Instead it has been assumed that (page 39 para 9.13.7) a mechanism will be put in place to commute S106 monies for affordable housing from one area of the borough to another. There is no certainty that this mechanism will work or be successful in practice, and still recognises that access to affordable housing will still be a significant problem.
- 2.14 It is of particular note that in the recent appeal decisions (3133113 and 3133112; attached as appendix 2 to our matter 9 representation) the Council and the appellant reached common ground on the **pressing need for affordable housing**. Paragraphs 54 and 55 from that appeal decision are set out below:

It is common ground that the Council cannot demonstrate a five-year supply of deliverable housing land and that there is a pressing need for affordable housing within the Borough as a whole and particularly on the Isle of Sheppey⁹. The comments of the Head of Housing in the report to Committee of 21 May 2015 identified the lack of new affordable homes on Sheppey and commented on growing numbers of low income households competing for increasingly unaffordable housing in the private rented sector. Proposals within the emerging local plan for a zero percentage contribution of affordable housing from new build schemes on the Island were also noted; a factor due to the lack of viability of new housing as opposed to the lack of a defined need. The Head of Housing concluded that it was imperative that the 35 homes within the development were provided to ensure at least some of the existing need is met.

In the face of that combination of a lack of supply, high demand, and the difficulty in securing new affordable housing as part of future housing schemes, the contribution that the scheme would make towards meeting local housing need is a matter that attracts significant weight in its favour.

- 2.15 Given that the lack of affordable housing supply across the Borough and in particular on Sheppey (as clearly recognised by the Council) the capability of site SW/133 should have attracted significant weight in its favour when the Council went through the site selection process. This issue could have been picked up through the SA process, however as highlighted, the SA did not consider it necessary to assess a sites ability to deliver affordable housing.
- 2.16 The Plan's strategy for Sheppey (ST6) and Policy DM 8 should be modified to acknowledge there is a need for affordable housing within Sheppey and that sites that can clear help deliver this need should be allocated.
- 2.17 We support the Council's strategy to have a higher proportion of development within the Thames Gateway and the targets set out in Policy ST 4. However it does not appear any consideration has been given as to how affordable housing delivery can be maximised through that strategy, no consideration has been given to specific sites that can help to meet affordable housing need.
- 2.18 We consider that site SW/133 is a sustainable location for development. The information put forward through the examination process clearly indicates that the

site has many positive benefits to sustainability; one of which is the much needed delivery of affordable housing. This can help achieve the delivery of a specific housing need and assist with the Council's regeneration objectives.

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