**Statement on Local Plan Core Strategy**

As required by planning law, our determination of applications must be made in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) was published in 2012 and the independent planning inspector examining the Gravesham Local Plan Core Strategy considered affordable housing under two sessions which include its conformity with the NPPF:

## Scale and Distribution of Development/Housing – General (Including Omission/Alternative Sites) - Policy CS02

Issue 3i) Is the overall number of new dwellings sought in the LPCS based on clear and robust evidence of objectively assessed local needs for new (including affordable) housing over the plan period in accord with the NPPF or, if not, what needs to be changed and why?

## Housing Polices – Policies CS14, CS15, CS16, and CS17

Are the thresholds and percentages for affordable housing in policy CS16 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?

## The Inspector advised in his report1 for Issue 4 – Housing Policies (CS14, CS15, CS16, CS17), that:

All the available evidence, including the 2012 SHMA Update (HOU 01), points to a high level of local need for affordable housing at present. However, targets in the plan have to be not only practical but also economically viable if delivery is to be maximised over time. The evidence in the Council’s Affordable Housing Viability Study (AHVS) (HOU 03) is considered satisfactory and sufficient to justify that the levels and thresholds set out in the policy are appropriate as overall borough targets. It also confirms the generally differing residual land values between urban and rural sites, with the latter able to support a higher percentage provision, as well as a smaller site size threshold given the large ratio of new homes built on sites of less than 5 units there.

(Please note that the issue numbers used for the hearing sessions are not the same as used by the Inspector in his report)

## Following receipt of the Inspector’s report, the Gravesham Local Plan Core Strategy was adopted in 2014 as an NPPF compliant plan.

The Planning Inspectorate (PINS) letter to Andrea Kitzberger-Smith Planning Policy and Design Team Manager Serving Richmond and Wandsworth Councils entitled “CONSIDERATION OF AFFORDABLE HOUSING CONTRIBUTIONS FROM SMALL SITES IN APPEAL DECISIONS2 ” includes the following “the effect of the WMS (Written Ministerial Statement) was not to reduce the weight that should be given to the statutory development plan, or automatically to outweigh relevant development plan policies. Local policies still have weight as the starting point from S.38(6) and the WMS comes into play as a material consideration which post-dates the plan, and which has to be balanced against the plan and the evidence base supporting the LPA’s application of the policy”. The letter goes on to explain that the correct approach “would be for an Inspector to start with the development plan and any evidence presented by the LPA supporting the need for an affordable housing contribution, establish whether the proposal is in conflict with those policies”.

As part of his consideration of the Core Strategy, the Inspector recommended a number of main modifications to make the Plan sound and capable of adoption. This included a new Strategic Housing Market Assessment as part of the subsequent Site Allocations and Development Management Plan (Local Plan Part 2). A Strategic Housing and Economic Needs Assessment (SHENA) was commissioned in early 2015 and this included a Strategic Housing Market Assessment. The SHENA is being published as part of the evidence base for the Regulation 18 stage 1 Site Allocations and Development Management Policies Document consultation which starts on 25 April 2018. Gravesham BC members have been kept updated on the key evidence documents and, for example, a presentation was given to Planning, Regeneration and Business Development Cabinet Committee on 19 September 2017. The presentation – which is available from the Council’s website3 – highlighted to members the scale of the affordable housing needed within the Borough with a bullet point on page 16 explaining that, quantitatively with no viability considerations taken into account, “70% of new dwellings need to be affordable – many households cannot afford to rent or purchase a home”. Page 21 then includes the information for the affordable housing testing undertaken in the viability assessment part of the SHENA. This advises:

* Urban area 25% - 35% range, 30% policy is reasonable
* Rural area – results are stronger, suggesting a rate of 35-40% affordable housing can be accommodated

The Council recognises that the Written Ministerial Statement (WMS) of the 28 November 2014 as an “other statements of government policy” that can be a relevant material consideration when deciding applications. The intention of the WMS is to ensure that financial contributions do not become a disproportionate burden for small scale developers and thus frustrate housing supply.

Consequently, there is a conflict between the national threshold relating to the provision of affordable housing in the WMS and the PPG and the local thresholds set out in LPCS Policy CS16.

The Council will:

* Continue to consider Policy CS16 as part of the decision making process for any relevant application
* On a case by case basis, consider whether local circumstances with regard to affordable housing and the nature of the development site in the Borough are sufficient to warrant the disapplication of Policy CS16
* Give its recent evidence, as set out in the SHENA, affordable housing need will be given considerable weight by the Council in its balancing of the LPCS and Written Ministerial Statement (WMS) + PPG
* Request applicants to submit relevant information setting out scheme viability for independent assessment, at applicant’s cost, where they consider that the Affordable Housing Requirement is disproportionate
* Request applicants to set out why the application of Policy CS16 is considered to be disproportionate in relation to the circumstances of their development scheme.