

From: Meghan Rossiter [REDACTED]
Sent: 18 October 2021 16:33
To: Planning Policy Internet
Subject: Local Plan Consultation Response

Good afternoon,

Please accept the attached response to the current local plan consultation. I would be grateful if this could be acknowledged, and if any questions arise from the comments please get in touch directly.

Kind regards,
Meghan

Meghan Rossiter
Planning Manager
Abri

Collins House Bishopstoke Road

Eastleigh Hampshire SO50 6AD

T. [REDACTED]

<https://cdn.abri.co.uk/email-assets/AbriEmailAssets_03_small.png>

<<https://cdn.abri.co.uk/email-assets/LogoStrip.png>>

<<http://www.twitter.com/abrigroup>>

<<https://www.facebook.com/radiancommunity>> <https://cdn.abri.co.uk/email-assets/lcons_facebook.png>

<<https://www.linkedin.com/company/radian-group-ltd>> <https://cdn.abri.co.uk/email-assets/lcons_linkedin.png>

<<https://www.instagram.com/abri.social/>> <https://cdn.abri.co.uk/email-assets/lcons_instagram.png>

This email and any files transmitted with it are confidential, intended for the addressee only, and are subject to copyright. If you have received this email in error please notify the sender and abridataprotection@abri.co.uk <<mailto:abridataprotection@abri.co.uk>> immediately and confirm it has been deleted from your system and no copies made. For further information on how Abri uses your data go to www.abri.co.uk/privacy <<https://www.abri.co.uk/privacy>> , where you will find our privacy notices..

Abri is a trading name of Abri Group Limited (a Registered Society under the Co-operative and Community Benefit Societies Act 2014, no. 8537 and a charitable registered provider with the Regulator of Social Housing no. L4172) and The Swaythling Housing Society Limited (a Registered Society under the Co-operative and Community Benefit Societies Act 2014 no. 10237R and a registered provider with the Regulator of Social Housing no. L0689). Registered office: Collins House, Bishopstoke Road, Eastleigh, Hampshire SO50 6AD.

Authorised and regulated by the Financial Conduct Authority. The Swaythling Housing Society Limited provides management services for subsidiaries in the Abri group. Further corporate information is available at www.abri.co.uk <<https://www.abri.co.uk>>

Reasonable precautions have been taken to ensure no malicious content is present in this e-mail. Abri cannot accept responsibility for any loss or damage arising from the receipt of this e-mail or attachments and recommends that you subject these to your own screening procedures prior to use.

Please note, we do not accept service of legal documents by email or fax.

Planning Policy Team
Planning and Regeneration Services
Gosport Borough Council
Town Hall, High Street
Gosport
PO12 1EB
planningpolicyconsultation@gosport.gov.uk

Collins House
Bishopstoke Road
Eastleigh Hampshire
SO50 6AD

Tel: [REDACTED]

www.abri.co.uk

Ref: Local Plan

Date: 18.10.2021

Dear Mr Jayson Grygiel,

Re: Gosport Local Plan 2038 Regulation 18 Stage Consultation

Abri is pleased to submit representations on the Reg. 18 consultation draft stage Local Plan as published in September 2021. As one of the largest housing providers based in the south of England we are working to deliver more homes for those in need, in communities where everybody has the opportunity to belong, grow and thrive.

We own 35,000 homes and work on behalf of 80,000 customers and we are looking to do more. We have secured a strategic partnership grant allocation of £250m to deliver 3,218 homes, increasing delivery by 2,500, 25% above our ambition to deliver 10,000 homes by 2030. Abri is a long-standing landlord and developer in Gosport, as Radian, and delivering in Gosport is part of our ambitious delivery strategy. Our comments focus on those areas of the draft policies affecting the overall deliverability of housing.

Key Comments

We acknowledge the difficulties of maximising delivery of housing across Gosport, and support the Council's objectives to deliver a sustainable, healthy Borough with an enhanced sense of place where people choose to live and work. We understand that this plan is at an early stage of development and that much work remains to be done to evidence the need for and scope of its policies. To ensure a continued supply of new affordable housing across the Borough, these policies need to be practically deliverable and viable.

The Government published a revised NPPF in July 2021 and this followed the earlier publication of a Written Ministerial Statement on First Homes, together with PPG updates. We expect the changes brought in by each of those documents will be reflected in the next stage of the Local Plan. It is also relevant to note that the new Secretary of State for the Ministry of Housing, Communities and Local Government, Michael Gove MP made comments at the recent Tory Party Conference indicating that he would not be pursuing large-scale reforms to the planning system. This should give the Council some comfort that the Local Plan review may continue at pace.

1.6 Gosport Profile and Issues

This section of the emerging Plan acknowledges the critical need to deliver sufficient affordable housing to meet diverse local needs, identifying the high income to house price ratio which seriously restricts the opportunities for local people to rent or purchase housing. Delivering housing in Gosport is challenging, and it is only by partnering with organisations, as seen on the joint delivery with Homes England, Wates and Abri at Daedalus Village, that more needs can be met.

Policy D7 Flood Risk and Coastal Erosion

Point 2 of this policy requires the use of the Sequential Test to justify residential development on unallocated sites, however such a policy should only apply to those sites within Flood Zones 2 and 3. The policy may be reworded to state:

For development proposals in Flood Zones 2 and 3 not allocated in the Local Plan ...

Policy D8

The intention of this policy is supported. The detail of point 7 does not yet reflect the intentions of the supporting text which allow for submission of Health Assessment information within any planning application document, such as a Planning Statement, Design and Access Statement or standalone work. This point may be reworded to state:

Planning proposals for the following types of development will be required to incorporate a Health Assessment as part of the planning ~~statement that accompanies any planning application~~:

Policy H2 Affordable Housing

Abri supports Gosport's commitment to maximising affordable housing delivery across the Borough. Bringing forward the affordable housing target figure from the adopted Local Plan is ambitious, and needs to be tested for viability in an up-to-date whole-plan viability appraisal.

We note that the level of affordable housing delivered in Gosport has been a reasonable proportion of overall delivery in recent years, however the Demographic Projections report (2019) identified the need to deliver 194 (net) new affordable homes per annum over the period 2019-2036. The 2020 AMR shows that just 19 (gross) affordable homes were completed in the period 2018/19-2019/20. Accounting for Right to Buy losses of 26 affordable homes over the same period, the authority has had a net loss of 7 affordable homes from the stock for local people. This information serves to emphasise the strong need for ambitious, but realistic policies throughout the plan to ensure a net increase in affordable housing over the new plan period.

Point 2 of this policy correctly encourages an appropriate mix of tenure mixes, but this no longer accords with the NPPF Annex 2 definition of affordable housing and should be amended in kind. Abri welcomes the introduction of tenures that help meet diverse housing needs, and notes that as the plan is at an early stage the Council will also need to consider the impacts of introducing First Homes into policy.

Point 3 c) needs to be redrafted. The retention of affordable housing *in perpetuity* is a national policy requirement for affordable housing delivered on rural exception sites only, following changes to the NPPF in 2019. The extension of such a requirement to all tenures and modes of delivery in policy is inappropriate and would create difficulties for delivery. For clarity, the Glossary should adopt the NPPF definition of affordable housing with its specific restrictions for individual tenures, supplemented if necessary by local definitions of affordability, and **point 3 c)** of the policy and reference to this in para. **5.4.14** should be removed.

While the flexibility in ensuring sites are brought forward with the right types of affordable housing is welcomed, as the introduction of this First Homes reduces the delivery of shared ownership and other intermediate affordable housing, this policy should consider whether there it will be important for the policy to set a clear position on determining how best to meet local needs, instead of relegating this to supporting text. While the Demographic Projections (2019) report identified no need for affordable home ownership in the area, such tenures make a valuable contribution to the viable delivery of social and affordable rented homes. The indication at para. **5.4.9** that the Council will support shared ownership, and the acknowledgement of this in a preferred tenure split is supported in principle.

As with our comments above however, the phrasing of the split at **5.4.10** and in the **Glossary** are not in accordance with the definitions in the NPPF and should be amended for clarity.

Policy DE1 Sustainable Construction

Abri is committed to decarbonisation and delivering sustainability through all its work, as demonstrated by the recent launch of The Greener Futures Partnership with Anchor Hanover Group, Home Group, the Hyde Group and Sanctuary Group which is working to lower emissions, reduce fuel poverty and improve living conditions for residents by creating sustainable, affordable, healthier and safer homes. This sits alongside our work to deliver high quality, affordable homes, increasingly through Modern Methods of Construction and with efficiency standards working towards becoming carbon neutral.

These ambitions are at the heart of our work, but this cannot be achieved where policies are set too high to deliver viable development. The expectation in **point 2** of the draft policy for Passivhaus or equivalent level standards is excessive, as is the expectation in **point 3** for residential developments to achieve BREEAM 'Very Good' or equivalent, as each expect a very significant increase in standards as against current Building Regulations standards and build costs. These policies need to balance the ambition for sustainability with pragmatism for what can be achieved locally without a considerable increase in subsidy.

We note that the Future Homes Standard consultation undertaken by MHCLG (now LUHC), which sought to align the FHS with the U-values in the Passivhaus standard, was concluded in early 2021. The Government's response was that a transitional approach to the FHS would be needed to steadily influence fabric standards, without producing a cliff-edge effect with disproportionate, damaging implications for build costs and delivery. This stage of the Plan is not yet supported by any viability work and we ask that this is undertaken at the next stage to properly understand the impact of the proposed policies, including draft Policy DE1 on deliverability. We recommend that the references to Passivhaus and BREEAM standards are removed in favour of alternative, minimum design standards, to prevent this policy damaging the overall delivery of affordable housing across Gosport.

