These further representations relate to the Inspector’s comments as stated in ID12:

"The South East Plan has now been revoked. Whilst this has been long expected and was a matter touched on in some of the hearings, the above consultation provides the formal opportunity for anyone to comment on the significance of that step for the soundness of the plan and this opportunity should be highlighted. In addition, representations can also refer to the ONS Household Projections by local authority area published in April 2013 so far as is relevant to the scope of this plan and previous representations made."

Summary

1. The South East Plan (SEP) formed part of the Development Plan with the Core Strategy (CS) which was set up to conform to the SEP. This has now been revoked. The policy context for the Part 2 Plan is therefore now the CS and the NPPF.

2. As submitted to the EIP, the Part 2 Plan does not allocate the further 50 homes to meet local housing need in Totton under CS12. This is despite a compelling evidence base that identifies a significant and steadily worsening housing need (for both market and affordable).

3. Following the expiry of the NPPF implementation period, the weight now to be attached to the CS policies in preparing the Part 2 plan depends on the extent to which they are in conflict with the NPPF. The CS wording in policy CS12 (stating ‘possible additional development..) is in conflict with the NPPF tests.

4. This is because the NPPF represents a significant shift in the tests that LPAs must apply. The needs must now be met, unless the LPA can show that the adverse impacts of doing so would ‘significantly and demonstrably outweigh the benefits’.

5. The important soundness tests (robust evidence base; the most appropriate strategy when considered against reasonable alternatives; and consistency with NPPF) are plainly not met. This is because there are ‘reasonable alternatives’ that have sadly, been too easily discounted.

6. The objectors consider that the benefits of meeting the pressing need for affordable housing have not been carried out in a sound way, or indeed at all (see earlier representations).
7 The objector Charities highlight their land at Loperwood, Totton, which was short-listed in the earlier consultation for release for housing (and found suitable for development by numerous local plan Inspectors). This will now have development and major roads all around it (following the release of Loperwood Farm to the north of the site).

8 The release of this site for 50 homes (70% affordable housing) would be in accordance with the CS policy CS12 and make a very useful contribution to meeting the pressing housing need. It would simply deliver the level of housing expected in the CS already.

9 It involves only part of the site (the southern portion) and makes best use of the pond and copse for open space linked to the nearby recreation ground. The Charities will bring forward the land as soon as possible.

Procedural Matters - withdrawal of the SEP

10 There was a requirement in the 2004 TCP Regs as amended - 13 (6) that the policies contained in a DPD must be in conformity with...the policies in the core strategy.

11 These regs were replaced with the March 2012 TCP Regs No. 767 (N71) which removed this specific part of hierarchy. We now refer to 'local plans' rather than 'DPDs', reflecting the NPPF.

12 The effect is that, where a Core Strategy was adopted prior to the NPPF as in this case, and in applying the new NPPF direction under para 47 to 'Use their evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area', then the Local Plan Part 2 now under examination can (and we say should) meet that need.

The new ONS Projections

13 The ONS figures (https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections) demonstrate an increase in both population and households for New Forest District. Between 2011 and 2021, there will be 15,000 increase in population and 8000 more households (800 per annum).

14 The CS predicted that the population would fall but the new evidence shows otherwise. This contrasts with the planned delivery through the CS of less than 200 new homes per year.

The SHMA and Local Evidence Base

15 The evidence from the Strategic Housing Market Assessment (DTZ Final Report Nov. 2007 Background Paper 24) has shown that, with a 'house price to earnings ratio' of 11:1 (ratio of lower quartile house prices to lower quartile earnings in 2006), two-thirds of newly forming households cannot afford to buy or rent in the market.

16 An estimated 470 - 580 households a year fall into housing need. At May 2008 over 5,200 households had housing applications registered in New Forest District. (4383 in high
priority or priority need - 84% had a local connection). The Strategic Housing Market Assessment estimates a minimum annual need for 660 additional social rented homes **every year** in New Forest District.

17 Recent figures supplied by the Housing Department of NFDC (supplied 11th November 2013) confirm that there are currently 1344 in need of affordable housing just in Totton.

18 The total number on the housing register for the whole of the New Forest was 4,864. (Note to be eligible applicants must be currently living in the district for the past 2 years or have previously lived in the district for 10 years or more).

19 It is common ground that the affordable housing completions in recent years have been generally under the 100 dwellings per year, that is the minimum target under CS14. The release of 50 homes at Loperwood under CS12 would therefore assist in meeting this target and fulfilling policy expectations.
Changes sought to the Part 2 Plan to make sound

20 The allocation of all or part of Land at Loperwood, North of Loperwood Lane, Totton - see proposed detailed allocation wording for proposed policy inset below, published by the LPA. The number given here is 75 homes, which is justified in the light of the change of circumstances and policy tests to be applied as detailed above.

21 However, the Charities would also support the release the land for around 50 homes which is compliant with the CS under CS12 and CS15 to specifically address affordable housing need - 50 homes (70% affordable).

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<th>TOT2: Land at Loperwood, north of Loperwood Lane</th>
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Land at Loperwood, as shown on Map TOT2/3, is identified as a possible site for residential development, to provide for housing needs in accordance with Policies CS11, CS12 and CS15 of the Core Strategy, and public open space. The site could accommodate up to around 75 dwellings. The provision of a community centre for the blind and children’s nursery (as proposed by the site’s owners) could also be acceptable. The remainder of the site should be used to provide a significant area of new public open space, in excess of the development’s own immediate requirements, and allotments.

In addition to policy requirements in the Core Strategy and Development Management Policies in Section 2 of this document, development on this site would be subject to:

- provision of vehicular access from Loperwood Lane;
- provision of footpath/cycleway connections through the development site to link it to the cycle route running along the western boundary of the site and the recreation ground to the east;
- retention of important boundary and feature trees and hedgerows. In particular, the central pond and woodland should be retained;
- landscaping of the south-eastern boundary of the site in order to screen development from existing residential properties. Enhanced landscaping of the northern, western and south-western boundaries in order to screen development from road and cycle routes and provide a high quality setting for the development;
- informal open space and natural play for younger children should be provided within the new residential development. Additional formal public open space should be provided to link in with King George Recreation Ground;
- recreational facilities for young people should be provided either on site or on King George Recreation Ground; and
- provision of land for a minimum of 10 full size allotments plots within the site in order to provide for local needs arising from the development and in the wider community.