

H4 is not deliverable. Nothing in the subsequent representation of 4th September alters this statement as no evidence has been provided to explain the reversal of the intention to withdraw the site from the NP or to demonstrate that Policy H4 is viable.

None of this is surprising given that neither of the two planning permissions previously granted in 2015 and 2020 provided 100% affordable housing. Both applications were submitted by D B Land and were opposed by the Parish Council. The 2014 application which was granted at appeal, was submitted as an Exception Site for 12 market houses and 12 social rent. In 2015 a further application was made by D B Land to change the 12 social rented properties to 8 social rent and 4 shared ownership with the justification being provided by a viability report. The 2020 application was also submitted as an Exception Site with the same 50-50 split of affordable and market houses supported by a viability report to demonstrate that market housing was necessary to deliver the affordable housing which this time included no social rent.

No evidence has been provided in the NP to demonstrate that Policy H4 is deliverable. Based upon the previous permissions the delivery of 100% affordable housing in this location has not been achieved with only 50% of the dwellings being affordable. The promoter's letter of 21st August makes it very clear that nothing has changed and that Policy H4 is not deliverable. The letter specifically states that the site is being withdrawn from the NP to then immediately be brought forward as an Exception Site to ensure that the affordable housing can be delivered because "were it to be placed in the NP this would then preclude the site being delivered in this way and therefore the affordable housing would not be developed." This is a very compelling and damning statement by the promoter of the site on behalf of the landowners, that Policy H4 is not deliverable and that the only way to deliver 14 affordable houses is through cross-subsidy with market housing. This would necessitate a complete change to Policy H4 and require a full reassessment of the site's acceptability.

The letters from DB Land (which have been accepted by the District Council,) provide information that undermines Policy H4. As stated in our Regulation 16 representation, Policy H4 is not necessary as the site should be brought forward as an Exception Site, where its suitability and acceptability would need to be tested. This position is accepted by DB Land as the promoter of the site. Policy H4 has not been justified and is not deliverable. It follows that Policy H4 cannot be deemed to represent sustainable development and therefore it would fail to accord to one of the basic conditions required to deem the NP acceptable.