



Core Strategy Submission

Consultation Response Analysis by Topic

AFFORDABLE HOUSING



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

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1 Introduction

1.1 This document sets out a consolidated summary and analysis of the Core Strategy responses received in relation to the the provision of affordable housing at Pre-Submission stage (Consultation period 2nd April to 25th June 2012) and at the Schedule of Proposed Changes stage (consultation period of 5th November - 21st December 2012.). The analysis relates to chapters 3, 4 and 15.

1.2 The Councils have set out responses to the representations received at the Pre-submission stage which also include where changes have been made to the Core Strategy as a result of representations received. Where changes have not been made to the Core Strategy as a result of representations the reasons for this are explained.

1.3 In response to representations received to the Schedule of Proposed Changes to the Pre-Submission Core Strategy, the Councils have set out their position following this consultation stage. No changes have been made to the Core Strategy following this consultation stage for the purposes of the Submission Core Strategy.

2 Analysis of Responses

Affordable Housing

2.1 The Core Strategy Vision

Pre-Submission

The unmet housing needs of the area will be reduced, with housing delivered of a type and tenure which meets the aspirations of those wishing to buy or rent.

2.2 Summary of Responses

2.3 Representations on the text of Chapter 3.

- Local estate agents should have been consulted on the type and size of housing needed in the area.
- The statements about housing need are not strongly enough expressed and do not reflect accurate information.

2.4 Representations on the Core Strategy Vision

- The Vision should refer to meeting housing needs, rather than to reducing needs.

2.5 Councils' Response - how we have taken into account the consultation responses?

2.6 There is a clear strategy to meet housing requirements across the Core Strategy area. However absolute housing need is significant, and demand for housing in this area almost limitless, and thus discussion of meeting needs completely should be realistic.

Pre-Submission

Objective 5

To deliver a suitable, affordable and sustainable range of housing to provide for local needs.

2.7 Sufficient housing will be provided in Christchurch and East Dorset to reduce local needs, whilst maintaining the character of local communities. This housing will include well planned sustainable new communities in appropriate locations. The **size and type of dwellings** (both open market and affordable) will reflect current and projected local need through the Strategic Housing Market Assessment. All residential development resulting in a net increase in dwellings will contribute towards **provision of affordable housing**, at a rate of 35% of total units being developed. Development of 100% **affordable housing schemes may be considered exceptionally** in land adjoining rural and urban settlements. Criteria for the provision of **Gypsy and Traveller** sites will be established.

2.8 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	

Table 2.1

2.9 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2412
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3226
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2708
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3661
523319	Mr Ryan Johnson	Turley Associates	CSPS3292
523319	Mr Ryan Johnson	Turley Associates	CSPS3773
523531	Mr Tim Hoskinson	Savills	CSPS2113
523531	Mr Tim Hoskinson	Savills	CSPS3184
653852	Mrs Susan Newman-Crane		CSPS645
654506	Mr John Showell		CSPS805
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS827
656629	Mr John Campbell	Roeshot Hill Allotment Association	CSPS3837

2.10 Summary of Responses

- **Affordable housing**

- A number of objectors referred to the lack of affordable housing and the need to limit in-migration to the area in some way in order to ensure housing for local people.
- There should not be a specific target for delivery of affordable housing, rather a site-by-site approach.

2.11 Councils' Response - how we have taken into account the consultation responses?

2.12 No changes have been proposed to this Objective in response to representations. Housing proposed within the plan addresses housing need and demand as identified in relevant evidence, but it is also noted that absolute housing need cannot be reasonably met through housebuilding. Hence the wording of the objective is considered appropriate.

Policy KS3 and KS4

Pre-Submission

...The Council(s) aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2...

2.13 Summary of Responses

2.14 No responses received.

Policy LN3: Provision of Affordable Housing

Pre-Submission

Policy LN3

Provision of Affordable Housing

In order to maximise the delivery of affordable housing the Councils will require:

All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.

On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable.

If an alternative site is not available, a financial contribution in lieu of provision may be accepted.

Financial contributions should be of equivalent value to on-site provision.

Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a local connection.

The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment. Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Any planning application which on financial viability grounds proposes a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

2.15 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
25	0	0	25	9	13	11	11	10	13	10	13	16

Table 2.2

2.16 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS906
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2102
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3573
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3559
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3981
359277	Mr Jamie Sullivan	Tetlow King	CSPS2705
359284	Miss Lynne Evans	Southern Planning Practice	CSPS2228
359295	Mrs Maria Humby	Alderholt Parish Council	CSPS4005
359555	Mr L Hewitt	Wimborne Minster Town Council	CSPS2071
360082	Mr and Mrs K Healy		CSPS2511
360149	Mr John Urquhart		CSPS90
360271	Cllr Paul Timberlake		CSPS502
360289	Mr Kevin Hodder	East Boro Housing Trust	CSPS2323

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3421
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3422
360792	Miss Carol Evans	Evans & Traves LLP	CSPS3482
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2710
474462	Mrs Sheila Bourton		CSPS193
507525	Mr David Lander	Boyer Planning Ltd	CSPS3222
510796	Mr Rollo Reid		CSPS2720
523319	Mr Ryan Johnson	Turley Associates	CSPS3301
523319	Mr Ryan Johnson	Turley Associates	CSPS3786
523531	Mr Tim Hoskinson	Savills	CSPS2134
523531	Mr Tim Hoskinson	Savills	CSPS3208
524723	Mr John Worth	Wimborne Civic Society	CSPS1947
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3690
647876	Mr Christopher Whitcher		CSPS123
647898	Mr Derek Beasley		CSPS115
650810	Ms Fiona Astin	Synergy Housing	CSPS389
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS927
654704	Mrs J E John		CSPS1060
655432	Mr Andy Davies		CSPS1025
655526	Mr Paul Morrison		CSPS1040
656228	Mr Adrian Dwyer		CSPS2487

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2774
656426	Mrs Pauline Pritchard		CSPS2755
656527	Ms Nicole Cox		CSPS2814
656534	Mr Rob Warn		CSPS2824
656536	Ms Wendy Voller		CSPS2831
656650	Mrs Patricia Fear		CSPS2446
656664	Mr Glen Morrison		CSPS2461

Summary of Responses

• **General Comments**

- 50% affordable housing supported on allocated greenfield sites.
- 50% and 40% are ambitious but worth pursuing provided properties are scattered.
- We need more affordable housing – only worth doing CN1 extension if majority affordable.
- Maximise affordable housing to meet need.
- Should be secured in perpetuity.
- Section should include a reference to upholding the total number of affordable homes, even if the percentage is not the same on each site.
- Paragraph 7 – amend to secured in perpetuity for those in housing need and with a local connection.
- Experience of very high targets (South Hams) is not positive.
- Policy targets of 40% and 50% will not be effective in East Dorset.
- Do not understand why mix on-site must reflect the Strategic Housing Market Assessment when neither the Council providing the necessary levels of housing necessary to address affordable housing needs.
- Amend paragraph 11.17 – include a commitment that annual housing completions survey will include a review with meeting local need.
- Addressing duplication in the Housing Register – figures should be published and used in assessing the real need for affordable housing before the Pre-Submission document is submitted.
- Will support while there is a proven need and that affordable housing is allocated to those with Local Connection or work in the area.
- Concern in community that housing will be allocated to people who are not local.....
- Delivery of maximum number of affordable homes/Intermediate for local people is most strongly recommended.

- Housing Need must be for Christchurch residents – families.
- Local need must be prioritised and seen to be working. If no need then overall housing numbers (market and affordable) should be reduced.
- Christchurch has large areas of brownfield sites that could easily be used for housing – housing should blend in and not destroy the greenbelt.
- Should build houses on supermarket sites instead.
- No greenfield wanted should build on brownfield and infill.
- Affordable housing should be allocated on brownfield sites close to town and local amenities.
- Must be other sites, other than greenfield that could be developed.
- Empty properties should be used rather than building on greenbelt and the need for new dwellings.

An unsound evidence base

a) Percentage of affordable housing (40%) on non-greenfield sites

- Evidence base questioned that seeks to justify 40% viability
- Three Dragons report prepared in 2008 when minimum was 30 dwellings per hectare and prior to Government guidance that garden land should not be regarded brownfield. Report showed it would be possible to provide 40% affordable housing in higher value areas. Also assumed that within the higher value areas, a density of 30 dwellings per hectare could be achieved. However, may not be achievable in higher value areas of CBC & EDDC, therefore questions the density of development in high value areas would be sufficiently viable to deliver affordable housing.
- Three Dragons evidence also suggests that the percentage of affordable housing should vary according to the different market value areas, rather than a blanket of 40%.
- Will result in all of Planning Applications (to include 40% affordable housing) being accompanied by viability assessments.
- Undermined by flawed assumptions in Three Dragons report over existing use values as majority of residential development comes through existing housing.
- Three Dragons does not set out what is expected as reasonable developer risk and profit. The residual land value stated in case studies does not take account of costs, e.g. stamp duty for the owner to move, capital gains tax, legal fees. In three out of four cases in Christchurch, landowners need to be incentivised to move for development purposes.
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing uses value. Assumptions in Three Dragons result in too high a proportion of the residual land value being an affordable housing contribution – such sites will not come forward.
- The Strategic Housing Land Availability Assessment confirms that a very high proportion of Planning Applications in CBC & EDDC are for developments of less than 5. Often within suburban locations. Often have low densities 15 – 30 dwellings per hectare (demonstrated in key

facts of HE2). Yet HE2 requires compatible densities – maximum of only 30 dwellings per hectare likely to be tolerated. Therefore conflict between HE2 and Three Dragons.

- Three Dragons report assumes much high densities to deliver 40% affordable housing (case study D questioned – site of that size is rare and at 50 dwellings per hectare likely to fail the test of distinctiveness). With high proportion of detached houses and bungs, probability of 50 dwellings per hectare is highly unlikely

b) Development costs and the likely impact on viability

- Evidence has not taken account of the full range of likely development costs and the impact on viability.
- Does not appear that the Council has taken account of Community Infrastructure Levy, SANG and mitigating impact of the Special Protection Area, and also delivery of zero carbon by 2016, space standards.
- Modelling should assess impact of CSH4 – Part L of Building Regulations constitutes 80% of code costs and will be mandatory from 2013.
- Space standards of LN1 could have serious implications.
- Community Infrastructure Levy and S106 based on a low obligations package. Reports do model £15k but only cite residual land values on schemes at 50 dwellings per hectare at 40% - impact of 50% and 30 dwellings per hectare much worse. On a 30 dwellings per hectare scheme the residual land value would be reduced by a further £450k.
- Unlikely residual land values will incentivise landowners to bring forward land.
- Cost of Zero Carbon post 2016 had potential to add £16k to £23k per dwelling. Viability needs a cushion to ensure costs can be accommodated.
- Three Dragons report does not include evidence of the impact of other S106 contributions on viability, such as heathland, transport contributions and open space. No hierarchy of priorities of the contributions within the Core Strategy. Neither decision maker nor applicant is guided (NPPF requirement).
- Review of the evidence base called-for, removing minimum density requirements removal of gardens from brownfield and that the majority of other sites are unlikely to achieve a minimum density of 30 dwellings per hectare.
- Suggests that the local authorities consider setting % of affordable housing having regards to the different market value areas.
- The Three Dragons evidence indicates 5 value areas in ED. Three policy options were recommended but Council opted for 50% on Greenfield – but Verwood falls in the low value area band (35% to 40%).
- To ensure soundness, sites in Verwood should have targets of 35% to 40% to take account of its Low Value Area.

Failure to follow NPPF requirements

- To accord with NPPF, local plan should include a trajectory for the delivery of affordable housing (Paragraph 12 of NPPF)
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing use value. Assumptions in Three Dragons result in too high a proportion of residual land value being an affordable housing contribution – such sites will not come forward.
- NPPF Para 173 requires that scale of development should not be subject to a scale of obligations and policy burden that threaten viability – should still result in competitive returns for landowner and developer.

- Burdensome policy fails to take account of relevant market and economic signals (158 NPPF).
- The NPPF states that policies need to be flexible to changing market conditions – no indication of scope for flex.

Removing thresholds and the associated implications for small schemes

- Policy trigger will hinder new development and frustrate objectives of the Core Strategy. Such a low threshold likely to stymie development – therefore contrary to NPPF objectives to bring forward development.
- The requirement for all schemes to provide a minimum target of affordable housing is too restrictive. Should be a starting point for negotiations
- Concerns that smaller developments will lead to considerable strain on Officer time to negotiate S106 agreements and to go through appeals for small amounts of affordable housing. Rather see resources put into largest schemes delivering highest proportions of affordable homes.
- Triggers for on-site, off-site and commuted sums needs reconsidering to enable smaller developments to come forward.
- One to two units – no affordable housing but Community Infrastructure Levy contribution. Three to six units – off site commuted sum. 6+ S106 affordable housing on-site.
- Reconsideration of the minimum scale of development before an affordable housing requirement is triggered

Insufficient flexibility within the policy

- NPPF states that policies need to be flexible to changing market conditions – no indication of scope for flexibility.
- Meeting local needs background paper acknowledged that requirements for affordable housing must not conflict with objectives for housing and economic growth.
- Site WMC3 includes exception elements that are in accordance with normal greenfield developments. Flexibility needs to be maintained in the manner of precise percentages of affordable housing.
- Concerned the policy may be over ambitious and has a lack of flexibility to deliver optimal amount of affordable housing.
- If insufficient flexibility is applied to 50% affordable housing this may affect site viability, in turn reducing the overall delivery of residential units including market and affordable.
- Alternative means of affordable housing such as Affordable Rent are likely to play an important role and flexibility is essential.
- Para 177 says that affordable housing requirements should be kept under review. Core Strategy says nothing about what will happen to ensure flexibility should delivery stall due to policy failure. Nothing permitting local planning authority to move to tariff, or alternative if market conditions worsen. Nothing to anticipate the possible inclusion of affordable housing within the community infrastructure levy.
- The percentage of affordable housing should be expressed as minima and not maxima.
- The policy should include reference that any delivery target is subject to viability.
- Supports a flexible policy giving the council a degree of discretion in applying percentages of affordable housing, to take account of site considerations and on-site deliverables, in addition to viability.
- Recommend addition wording “up to 50%” and “where appropriate”, enabling discretion on a site by site basis.

- Greater flexibility on tenure mix should be incorporated to allow for a higher proportion of Affordable Rent and Intermediate Housing.
- Greater flexibility on tenure mix should be incorporated to allow for a greater proportion of intermediate housing.

Failure to address operational requirements and delivery risks

- Document should set out what mechanisms will be used to test viability submissions.
- As delivery of 40% affordable housing is unlikely, most applications will require “clear evidence” to be submitted. Will be especially pertinent for sites that could have the capacity of 5 units – as stated by Three Dragons and the proposed policy. The Strategic Housing Land Availability Assessment has proved that a high number of smaller sites have historically come through, therefore massive impact.
- No guidance on how evidence will be assessed - Are there benchmarks to be set down assuming the clear evidence means submitting viability assessments? Who will judge assessments? If the Councils bring in external expertise what will the cost be?
- Should this policy be introduced, no clear guidance on how it should be implemented.
- Uncertainty around time and money in entering negotiations – landowners will not have confidence. Too much speculation for developers.
- Bournemouth approach also led/informed by Three Dragons; Policy led to a significantly reduced level of applications. Consequences led to amendment and a tariff for different sizes and locations to create more certainty. No flexibility for the 40% to be lowered and tariff still very high, but does offer a starting point for negotiations. Reference to work between local authorities. No evidence that consultation taken place with Bournemouth regarding the practical operation or policy implications in an area with broadly similar suburban style.
- Question 50% affordable housing as this may not be possible due to other costs (Sustainable Drainage Systems).
- If you make it too hard, developers won't develop.
- Inclusion of at least an outline of the mechanisms to be used to test viability.
- Consider a flexible figure for affordable housing which would reflect the geology and other factors of a particular site.

Other Matters

- To accord with NPPF, local plan should include a trajectory for the delivery of affordable housing (Paragraph 12 of NPPF)
- NPPF (paragraph 173) states decisions should provide competitive returns to a willing landowner – therefore the residual land value has to be a good proportion above existing use value. Assumptions in Three Dragons result in too high a proportion of residual land value being an affordable housing contribution – such sites will not come forward.

- NPPF Para 173 requires that scale of development should not be subject to a scale of obligations and policy burden that threaten viability – should still result in competitive returns for landowner and developer.
- Burdensome policy fails to take account of relevant market and economic signals (158 NPPF).
- Unclear why Council has site specific policies elsewhere in the plan that are not consistent with policy. This policy flexible enough to negotiate lower provisions at the point of submitting a Planning Application.
- There is no reason for different quota's on brown or greenfield sites. To comply with NPPF Local Plans must meet the full need for market and affordable housing, and yet policy LN3 will reduce the delivery of open market housing. Given that all net development will be required to make an affordable housing contribution in the future, the new policy approach must be monitored – it may avoid the need for higher targets on strategic sites and may even reduce the quota requirement overall. Para 50 of the NPPF requires that the size type tenure and range of affordable housing should reflect local demand – demand or need may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to the contrary, a two level quota policy is not justified.
- No evidence provided to support the increase from 40% to 50% affordable housing, or resultant 40% brownfield and 50% greenfield. Evidence not set out in the affordable housing provision of the Three Dragons report.
- Site specific affordable housing percentages should be removed and replaced with reference to policy MN3.
- Amend Policy LN3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites, i.e. the first sentence of the second paragraph of the policy.
- Affordable housing should be set at a target of up to 40%, subject to viability.

Councils' Response - how we have taken into account the consultation responses?

2.17 General Comments

2.18 Many respondents supported the Councils' affordable housing aspirations but were keen to ensure that the resultant housing should be secured for those with a local connection and in perpetuity. Considerable concern was expressed that affordable housing, along with market housing, should not be provided on the Green Belt but on brownfield sites – including the re-use of empty properties that should be targeted before building on the Green Belt. As part of its Housing Strategy, the Council is already actively seeking the reuse of empty homes where possible. Policy LN3 does not seek to prioritise affordable housing provision on either greenfield or brownfield sites, but seeks to ensure that where permissible development opportunities come forward, optimised levels of local housing needs are met for those who cannot afford to rent or buy on the open market.

2.19 The proposed policy already includes a commitment to ensure that affordable housing will be secured and retained for those in housing need and with a local connection. It is proposed that the Affordable Housing Supplementary Planning document will include detailed definitions of housing need and local connection, ensuring priority as appropriate.

2.20 An unsound evidence base

2.21 Percentage of affordable housing (40%) on non-greenfield sites & Development costs and the likely impact on viability

2.22 *Related facts*

2.23 The Three Dragons evidence was published in January 2010. New Build values that informed high level testing were stated as being valid at December 2008.

2.24 At 30 dwellings per hectare (all houses) & 40% affordable housing & £5,000 per unit for other s106 contributions and without grant (but for social rent and shared-ownership), residual land values in Christchurch then ranged from £1.89m per hectare to £3.30m per hectare. At the same density and percentage of affordable housing, residual land values in East Dorset ranged between £1.54m and £3.86m.

2.25 *Three Dragons Value Areas – East Dorset*

2.26 The high value market area in East Dorset included Cranborne, Witchampton, Edmondsham and Whitmore (example 2 bed terrace £310k),

2.27 East Dorset rural included Stanbridge, Horton Heath, Stapehill and Sixpenny Handley (example 2 bed terrace £260k)

2.28 Wimborne Minster and St Leonards (example 2 bed terrace £255,000)

2.29 Southern Settlements include Corfe Mullen, West Moors, Ferndown, Alderholt and West Parley (£220k)

2.30 Low Value East Dorset includes Verwood North, Verwood and Three Legged Cross (£205k)

2.31 *Three Dragons Value Areas – Christchurch*

2.32 Christchurch Rural North - Hurn and Airport (example 2 bed terrace £295k)

2.33 Christchurch Coastal - Highcliffe, Central Christchurch, West Christchurch and West Mudeford (example 2 bed terrace £240k)

2.34 Christchurch North - Winkton and Burton and North West Town area (example 2 bedroom terrace £230k)

2.35 Developers return noted at 15%

2.36 It is acknowledged that the Three Dragons evidence base is now out of date and it does not adequately reflect changed values in the market place since 2008. And although some calculations were carried out reflecting a higher £15,000 per unit s106 contribution, these were undertaken at 50 dwellings per hectare in Christchurch and 40 dwellings per hectare in East Dorset. Recent research has confirmed that 50 dwellings per hectare would be an unrealistic basis for informing policy setting. Given the likely number of lower density 'housing' and not flatted schemes, even 40 dwellings per hectare may be unsafe. The research basis for the recent Community Infrastructure Levy study has been 30 dwellings per hectare.

2.37 In light of changes in the market and the wider policy context, it would be inappropriate to solely rely upon the assumptions and evidence that informed the Three Dragons report. Given that the majority of new development is planned for the medium and lower value areas of East Dorset and Christchurch, the Councils' policies should reflect residual land values in these areas – the high value areas, even on an averaged basis, introduced unrealistic distortion.

2.38 Although some aspects of the Three Dragons report may withstand scaling to reflect the current market, its strengths are diminished by a number of weaknesses that undermine its validity in the current and future context.

2.39 The Three Dragons report usefully highlights the different historic value areas across East Dorset and Christchurch. These help to justify a policy seeking up to 50% affordable housing on the basis of potential market recovery. However, it is acknowledged that market conditions vary through time and the policy must allow for this as considered below.

2.40 *Failure to follow NPPF requirements*

2.41 As proposed in the draft Pre-Submission Core Strategy, the wording of LN3 requiring a “minimum” of 50% affordable housing on greenfield sites and a “minimum” of 40% on brown-field sites does not meet the NPPF requirements of demonstrating flexibility or the scope for negotiations to allow competitive returns to a willing landowner.

2.42 Although LN3 concludes by stating that evidence will be considered in support of viability arguments, this is confused by the previous ‘minimum’ requirements and the lack of a clear statement confirming that the Policy is sufficiently negotiable. Indeed the concluding paragraph is likely to be viewed as giving away as little as possible, and that the Councils are not willingly embracing the direction contained within the NPPF and the need for flexibility and the need to respond to changing market conditions.

2.43 The policy needs to be flexible to remain relevant as circumstances change. As a result, policy wording is amended to remove reference to 'minimum' requirements. The policy now allows for the Council to negotiate 'up to' affordable housing targets. This means that in strong market conditions high proportions could be negotiated and development remains viable. During poor conditions the policy is flexible enough to allow for the provision of lower proportions of affordable housing and still ensure development remains viable.

2.44 Although the need for flexibility is necessary across the board and for all types of residential developments, the Councils chosen approach to LN3 will have a major bearing on smaller schemes, and schemes on land with higher existing use values than is usually associated with ‘greenfield’ sites. An improved approach is therefore necessary giving greater flexibility, otherwise there is a risk that smaller schemes will not come forward – and in the past, these have made up a significant element of housing delivery for both East Dorset and Christchurch.

2.45 To comply with the NPPF it will be necessary to demonstrate that a flexible approach has been taken that works for small schemes and on land with higher existing use values; the model will need to offer certainty to land-owners and developers at a very early stage, rather than reactively requiring viability evidence, in the way that might be reasonably associated with large scale developments.

2.46 Coupled with evidence gathered through the recent Community Infrastructure Levy study, it is therefore recommended that the following changes be implemented to ensure that LN3 is a sufficiently flexible policy that meets the requirements of the NPPF:-

- That policy requirements be amended on the basis of 'up to' 50% affordable housing on greenfield sites and 'up to' 40% on brownfield sites
- That appropriate wording in the Policy allow for a mechanism to be introduced (through an Affordable Housing Supplementary Planning Document) giving a protected margin of return for owners of brownfield sites with higher existing use values, i.e. guaranteeing that a land value return of up to X% of existing use values will be exempt from Policy LN3 requirements. When combined with revisions to thresholds (see below) this step will give advanced certainty for many smaller schemes enabling land-owners and developers to:
 1. Predict if they will be subject to the policy.
 2. If they are subject to the policy, know what they can expect to pay.

2.47 *Removing thresholds and the associated implications for small schemes*

2.48 The Strategic Housing Market Assessment identifies a very high level of affordable housing need in the area. It is therefore appropriate to seek the provision of as much affordable housing as possible and this requires all schemes to be asked to make a contribution. However, the Councils appreciate that development must be viable for both landowner and developer. The policy therefore allows for the negotiation of provision on the basis of development viability.

2.49 On sites resulting in a net increase of 1 to 4 dwellings, the Council will accept on-site affordable housing provision in accordance with the policy or a financial contribution in lieu of on-site affordable housing, calculated in accordance with a commuted sum methodology which is to be set out in an Affordable Housing Supplementary Planning Document.

2.50 On sites resulting in a net increase of 5 to 14 dwellings, the Council will require on-site affordable housing provision in accordance with the policy, however, where this is not possible or at the Council's discretion, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the commuted sum methodology

2.51 On sites resulting in a net increase of 15 or more dwellings, provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable. If an alternative site is not available, a financial contribution in lieu of on-site affordable housing will be acceptable, calculated in accordance with the commuted sum methodology.

2.52 *Insufficient flexibility within the policy*

2.53 Objectors recommended that the percentage of affordable housing be expressed as minimum and not maximum – this is to be addressed. The policy wording should make it clear that the policy is flexible and any delivery targets are subject to viability – this is also acknowledged and will be addressed. Reference was also made to greater flexibility around the affordable tenure mix, however, it is considered that the policy wording already allows adequate flexibility, stating that the mix is subject to negotiation and agreement with the Council, subject to meeting Strategic Housing Market Assessment based housing needs.

2.54 *Failure to address operational requirements and delivery risks*

2.55 The concerns about viability assessment and associated delivery risks are acknowledged and it is accepted that at the point of adopting the Core Strategy, the Councils will need to have considered, consulted upon and adopted an Affordable Housing Supplementary Planning Document setting out the processes and service standards that will apply to Policy implementation, and explicitly around viability testing.

2.56 It was also strongly voiced that the Councils had not adequately learnt from the neighbouring Bournemouth experience/failure and its impact upon the number of planning applications. However, Bournemouth had since improved their position by setting a tariff system that has introduced more certainty.

2.57 The responses contained within this document, and the proposed changes to the emerging policy, demonstrate that the Councils are seeking to achieve a deliverable and flexible approach - one that achieves the balance between optimised affordable housing delivery; certainty for those with development interests, and flexibility – as directed by the NPPF – to facilitate housing and economic activity and growth. <insert text here>

Proposed Changes to the Pre-Submission Core Strategy

Policy LN3 Provision of affordable housing

~~In order to maximise the delivery of affordable housing the Councils will require:~~

~~All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.~~

~~A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.~~

~~On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable.~~

~~If an alternative site is not available, a financial contribution in lieu of provision may be accepted.~~

~~Financial contributions should be of equivalent value to on-site provision.~~

~~Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a local connection.~~

~~The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment. Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.~~

~~Any planning application which on financial viability grounds proposes a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.~~

~~To maximise affordable housing provision, whilst ensuring flexibility and sufficient margins to facilitate housing delivery, the Councils will require all residential developments to meet the following affordable housing requirements:-~~

Policy Percentage Requirements:

All greenfield residential development which results in a net increase of housing is to provide up to 50% of the residential units as affordable housing in accordance with the Policy Delivery Requirements and Affordable Housing Requirements unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide up to 40% of the residential units as affordable housing in accordance with the Policy Delivery Requirements and Affordable Housing Requirements.

Any Planning Application which on financial viability grounds proposes a lower level of affordable housing than is required by the Policy Percentage Requirements must be accompanied by clear and robust evidence that will be subject to verification.

Affordable Housing Requirements

The mix of affordable housing units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment (see Policy LN1). Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Conditions or legal obligations will be used to ensure that affordable housing is secured for those in housing need and prioritised for those with a Local Connection.

Policy Delivery Requirements:

- On sites resulting in a net increase of 1 to 4 dwellings, the Councils will accept on site affordable housing provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements or a financial contribution in lieu of on site affordable housing, calculated in accordance with the Commuted Sum Methodology.
- On sites resulting in a net increase of 5 to 14 dwellings, the Councils will require on site affordable housing provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements, however, where this is not possible or at the Councils' discretion, a financial contribution in lieu of on site affordable housing will be acceptable, calculated in accordance with the Commuted Sum Methodology
- On sites resulting in a net increase of 15 or more dwellings, provision in accordance with the Policy Percentage Requirements and Affordable Housing Requirements should be on site but where it is not possible to provide affordable housing units on the site, off-site provision on an alternative site may be acceptable. If an alternative site is not available, a financial contribution in lieu of on site affordable housing will be acceptable, calculated in accordance with the Commuted Sum Methodology.

Financial contributions should be of equivalent value to on-site provision calculated in accordance with the Commuted Sum Methodology.

Where developments are required to provide 10 or more affordable homes, 10% of the affordable housing element should be planned for households requiring specially adapted or supported housing. However, if a requirement for specialised affordable housing (or a viable delivery mechanism) cannot be demonstrated by the Council at the point of submitting a planning application, the quota shall revert to 100% general need affordable housing.

Under no circumstances will the financial consequences of including 10% adapted or supported housing result in a greater cost to the development than would arise through an acceptable, viable and proportionate mix of general need affordable housing.

2.58 Consultation Response Table

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
10	0	3	10	11	10	3		

Table 2.3

2.59 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS432
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS428
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS414
359277	Mr Jamie Sullivan	Tetlow King	PCCS105
359284	Miss Lynne Evans	Consultant Southern Planning Practice	PCCS247
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS406
359555	Mr L Hewitt	Town Clerk Wimborne Minster Town Council	PCCS58
475144	Sophia Thorpe	Gleeson Strategic Land Ltd	PCCS174
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS484
523531	Mr Tim Hoskinson	Savills	PCCS203
523531	Mr Tim Hoskinson	Savills	PCCS195
523893	Miss Lindsay Thompson	Senior Planner Terence O'Rourke Ltd	PCCS208

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
619967	Mr James Stevens	Strategic Planner Home Builders Federation (South West)	PCCS112
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS498
655010	Mrs S Moran		PCCS157
717797	Mr Stanley Jackson	Wimborne Civic Society	PCCS96
719231	Mr Mike Newton	Boyer Planning Ltd	PCCS504

Summary of Responses

2.60 1/ Unqualified support for the policy and revisions

2.61 2/. That revisions address concerns over the use of the housing target as a starting point for negotiations, but other representations have not been addressed.

2.62 Councils' Position

2.63 The respondent has not explicitly introduced objections to the proposed changes.

2.64 3/. Permitting a financial contribution in lieu of on site affordable housing

2.65 Regrets seeing provision for sites resulting in a net increase of 15 or more dwellings.

2.66 Councils' Position

2.67 The proposed changes have not introduced a new possibility to accept a financial contribution for sites of 15 or more but have modified the previous approach from 2 categories (below 5; or above 5 dwellings); to three categories (1 to 4 dwellings, 5 to 14 dwellings and 15 or more dwellings). The three category approach introduces greater flexibility. On 1 to 4 dwelling developments the developer can default to an off-site contribution; on 5 to 14 dwelling developments, the expectation is on-site provision, but at its discretion the Council can accept an off-site contribution. On larger 15+ developments, the expectation is on site provision, unless it is not possible to provide affordable housing on site.

2.68 4/. Requiring AH where new developments result in net loss of dwellings

2.69 That wording should be adjusted to prevent developers avoiding affordable housing when reducing the number of units on a site (example cited in Wimborne).

2.70 Councils' Position

2.71 The respondent has not objected to a proposed change.

2.72 5a/. Unsound evidence base

2.73 That up to 50% affordable housing is not justified by the evidence base on grounds of viability and threatens overall delivery of housing.

2.74 That the CIL evidence shows that provision in excess of 30% to 35% will render sites non-viable.

2.75 That the evidence base has not taken all development costs into account, or the overall viability of the plan.

2.76 Questions evidence base for 40% on brownfield sites. Does not accord with 3 Dragon findings, i.e. only viable at 40% in higher value areas, and at 30 dph or above (therefore not viable in lower value areas of CBC & EDDC, and on low density schemes).

2.77 That the Policy should not be up to 50% across the board on greenfield sites, but reflect the value areas and recommendations of the 3 Dragon evidence base, including lower value sites in Verwood having a target of 35%.

2.78 Councils' Position

2.79 In the 3 Dragon reports for both Christchurch and East Dorset (Findings and Policy Options), options included 50% affordable housing in higher value areas and 40% across the remaining areas.

2.80 The recent CIL viability research has confirmed that even under the current highly constrained market conditions, all residential development opportunities schemes across Christchurch and East Dorset (including brownfield and greenfield, large and small sites, and high value and low value areas) would be viable, at a minimum baseline of 30% affordable housing (of which 70% would be for Affordable Rent) and with a CIL contribution at £100 per square metre. In the Consultants opinion, many developments, especially greenfield sites, would still be viable with significantly more than 30% affordable housing. By stating 'up to' 40% or 50% affordable housing, and including explicit commitments surrounding flexibility, deliverability and 'sufficient margins' to facilitate housing delivery, certainty is given that the Council's affordable housing policy will not undermine deliverability or viability, where robust and verified evidence is provided.

2.81 It is recognised that proposed policy LN3 will need to be supported with detailed operational procedures, setting out how balances around 'flexibility and sufficient margins to facilitate housing delivery' will be applied in practise. These will be formally adopted, with prior public consultation, in the proposed Housing and Affordable Housing Supplementary Planning Document.

2.82 With exceptional levels of housing need and some of the worst affordability/income ratios outside London, both Councils intend to maximise the scope to secure affordable housing to address both social and economic imperatives for the long-term benefit of the local area. As proposed the policies will be flexible, enabling growth and housing delivery in the short-term, but equally ensuring that affordable housing provision is optimised and future proof over the life of the Core Strategy.

2.83 5b/. Viability

2.84 That the proposed changes fail to address the difference between viability and deliverability – it will be critical for landowners and developers to achieve competitive returns, especially if 70% Affordable Rent proportion.

2.85 Viability won't necessarily improve with increased house prices, as development costs will rise.

2.86 That the policy does not make it sufficiently clear that affordable housing requirements will be subject to viability assessment.

2.87 Considers that 40% brownfield policy requirement will result in viability assessments for all brownfield schemes seeking to reduce affordable housing.

2.88 Councils' Position

2.89 The first sentence of the newly amended LN3 text states that the Policy intends to maximise affordable housing provision, whilst ensuring flexibility and sufficient margins to facilitate housing delivery. The Policy wording states 'up to' 40% or 50% affordable housing, explicitly acknowledging the scope to deliver less. The text also confirms that any proposals for a lower level of affordable housing, must be accompanied by clear and robust evidence that will be subject to verification.

2.90 The text also confirms that the mix of affordable housing will be subject to negotiation but rightly and reasonably, counter proposals will be required to reflect identified housing needs in the latest SHMA. The scope for negotiation is also confirmed through the expectations that 'normally' the [affordable housing] tenure split should allow for 30% intermediate housing.

2.91 It is acknowledged that the proportions of affordable housing and the tenure mix of the affordable housing itself, could both be factors affecting viability. If it is demonstrated that either or both elements prevent viable and deliverable housing development, then scope is included within the policy to reduce the percentage of affordable housing, or to negotiate alternative tenure mix proportions – subject to meeting needs identified in the SHMA.

2.92 The policy principles are sufficiently flexible to address changing market and/or development cost circumstances, as long as expert evidence is submitted and is subsequently verified as part of the pre-planning and planning application process.

2.93 Unless the Housing and Affordable Housing Supplementary Planning Document makes provision for any exceptional tests or exceptional circumstances, any planning applicant seeking to provide less than 40% affordable housing on brownfield sites, will be expected to submit supporting viability evidence for verification. Carrying out such an assessment should form part and parcel of any prudent development business plan, and should not be viewed as an onerous requirement. However it is acknowledged that timescales for verification may be a critical factor in business planning, and the Councils will set out procedural service targets within the Housing and Affordable Housing Supplementary Planning Document.

2.94 5c/. Flexibility

2.95 By insisting that affordable housing provision must reflect identified housing need, the scope for negotiation is undermined – should state ‘ideally’.

2.96 Requiring affordable housing contributions on very small sites will hinder small developments coming forward and is inconsistent with NPPF.

2.97 No indication that policy is flexible as required by NPPF.

2.98 Councils' Position

2.99 The revised wording of Policy LN3 confirms that the requirement will be applied flexibly, recognising the need for ‘sufficient margins to facilitate housing delivery’, permitting negotiation and reductions in percentages of affordable housing, or adjustments to tenure mix, where these are justified and proven.

2.100 However the Policy must result in the meeting of identified housing needs, as set out in the latest SHMA (and as updated in the future). But at the current levels of unmet housing need across Christchurch and East Dorset, and with the diversity of housing need – for both Affordable Rented and Intermediate Affordable Housing – wide scope exists to negotiate the type and tenure mix of affordable housing.

2.101 Notwithstanding this scope for negotiation, evidence supports the justified prioritisation of affordable rented (or socially rented) housing in Christchurch and East Dorset where this is viable, as defined within the definition of affordable housing as set out in Annex 2: (Glossary) of the NPPF.

2.102 Unless the Housing and Affordable Housing Supplementary Planning Document makes provision for any exceptional tests or exceptional circumstances, all category C3 residential planning applications, large or small, showing a net increase in dwellings will be subject to the policy requirements of LN3. But as explicitly confirmed within the Policy, if supporting expert evidence is provided (and verified) demonstrating that sufficient margins can only be achieved through a reduced level of affordable housing (either onsite or offsite financial contribution), then the adjustments will be made.

2.103 As previously noted, carrying out such an assessment should form part and parcel of any prudent development business plan, and should not be viewed as an onerous requirement.

Policy LN4: Affordable Housing Exception Sites**Pre-Submission**

Exceptionally land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed in order to provide affordable housing, in perpetuity, provided that:

- The housing comprises 100% affordable housing.
- Secure arrangements are included to ensure that its benefits will be enjoyed by successive as well as initial occupiers.
- The proposed development would provide a mix of housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment.
- The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape.

This policy will apply to the following settlements:

East Dorset

- West Moors; St Leonards and St Ives; Three Legged Cross; Alderholt; Cranborne.
- Furzehill; Gaunts Common; Gussage St Michael; Gussage All Saints; Hinton Martell; Holt.
- Horton; Longham; Shapwick; Sixpenny Handley; Sturminster Marshall; Wimborne St Giles.
- Witchampton; Woodlands.

Christchurch

- Land Adjoining the built up area of Christchurch
- Burton; Winkton

2.104 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
9	9	3	19	12	4	15	2	13	5	11	5	5

Table 2.4

2.105 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359277	Mr Jamie Sullivan	Tetlow King	CSPS2739
359295	Mrs Maria Humby	Alderholt Parish Council	CSPS4007
359503	Mrs Lisa Goodwin	Knowlton Parish Council	CSPS2940
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2492
360082	Mr and Mrs K Healy		CSPS2514
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1569
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3423
360692	Mrs Wendy Britton		CSPS658
474462	Mrs Sheila Bourton		CSPS194
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS222
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3609
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3645
524723	Mr John Worth	Wimborne Civic Society	CSPS1952

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3691
650810	Ms Fiona Astin	Synergy Housing	CSPS390
653320	Mr Mark Huggins		CSPS821
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS928
654716	Mrs Barbara Huggins		CSPS809
654847	Mr Philip Strong		CSPS871
654848	Miss Susan Strong		CSPS873
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1485
656629	Mr John Campbell	Roeshot Hill Allotment Association	CSPS3836
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS3181
657152	Miss Suzannah Bath		CSPS1385
657154	Miss Katherine Bath		CSPS1384
657160	Mr Richard Bath		CSPS1383
657163	Ms Wendy Grace		CSPS1380

Summary of Responses

- **General comments**

- Fully support the policy.
- Policy is essential to support rural communities.
- Supports the policy of permitting 100% exception sites in Burton.
- Policy is unsound if Burton is included for exception site policy but Colehill is not. Colehill is comparable to Burton in terms of size and demography, and mix of housing. There is a lack of affordable housing in Colehill. Affordable housing is needed in Colehill to enable young people to live and work in their area who wish to live independently.
- 3 schools in Colehill and affordable housing needed so parents can be within walking distance.

- Why are some areas similar to others left out of Policy? Why not Colehill?
- Should apply to all urban and rural settlements.
- Should be left open to any Parish demonstrating housing need.
- If some settlements permitting market housing can also have exception sites, then so should Corfe Mullen.
- Does not see why affordable housing delivery should be constrained by the uncertainties of market delivery.
- Not sound as the policy is not consistent with NPPF Para 54 – should apply to rural areas and not a restrictive list of settlements.
- Change wording to permit any settlement that can justify housing need through a compliant Housing Needs Survey.
- Policy should be worded to permit exception sites on land adjoining the defined rural and urban settlements...
- Colehill should be in the list of eligible Parishes for exception sites, for the Core Strategy to be sound and legally compliant.
- Should be reworded to include other East Dorset settlements, notably Corfe Mullen.
- Should be reworded to be broadly rural and to remove the list of settlements

Policy should not be restricted to the land adjoining settlements and should not always be limited to small scale developments

- Is not always practical
- Policy should permit land adjacent to or in close proximity to [the settlement boundary]
- Delete the first Policy bullet point relating to 100% affordable housing .
- Should not be restricted to small scale – should reflect need. Amply covered in policy, ensuring that the development reflects the setting form and character of the settlement.
- Sites on edges of villages or villages that do not have shops and schools are unlikely to be sustainable and are going to require the occupants to have their own personal transport.
- Broaden wording to encompass redevelopment of brownfield or other infill sites.
- Delete 'small scale' in the bullet point

Permitting an element of market housing

- Very little subsidy now available at the current time and this is likely to continue.
- Should allow some market housing, say 70% affordable housing, 30% market housing. Would be more likely to encourage these sites to come forward and result in a better mix of housing promoting more inclusive mixed communities. Suggested by Para 54 of NPPF.
- To accord with NPPF should allow an element of market housing.
- Policy is unsound as its not justified – Council has not proven how exception sites will be viable without cross subsidy from market housing as permitted by NPPF.
- Change to permit inclusion of market housing to cross subsidise affordable housing provision.
- The housing comprises a minimum of 70% affordable housing (the balance could be made up by open market housing).

- Add “In exceptional circumstances a proportion of market housing may be considered appropriate where it can be demonstrated that the site would be unviable as an exception site that meets the above criteria, without cross subsidy”.
- Should allow market housing where this facilitates affordable housing.

Other Comments

- AH under this policy must be shown to benefit people with a strong local association and this restriction will be rigidly enforced.
- No evidence to show how many units exception site policy could deliver to reduce impact on greenbelt and new neighbourhoods.
- Policy is required to encourage landowners to build affordable housing within their estates to make up for housing sold and used as second homes.
- Large estates should be included.
- 100% Affordable housing schemes have potential to create socially excluded enclaves.
- The case for market housing is eroded by the inclusion of an exception site policy that will permit development in rural areas.

Councils' Response - how we have taken into account the consultation responses?

2.106 The need for a consistent settlement strategy for Policy LN4 has resulted in amendments to include Corfe Mullen and Colehill as eligible Parishes in order to allow for as many opportunities as possible.

2.107 It is acknowledged that occasions may arise where land that is very close to a settlement boundary may be appropriate for consideration as an exception site, however, such sites should always be small in scale.

2.108 Whilst it is recognised that funding affordable housing on exception sites has become extremely constrained, it is considered that a general policy explicitly permitting market housing on such developments, albeit to cross-subsidise affordable housing, could be counter-productive. However an appropriate policy should not be overly exclusive or prescriptive, including scope for innovation over the life of the Plan, and the flexibility to take individual circumstances into consideration.

2.109 Exception site policy requires strict controls over provision, management, equalities and ownership to ensure that occupation remains tied to those who are genuinely in housing need and who have local connections. The policy wording includes sufficient scope for innovation and provision through charitable bodies and organisations including Community Land Trusts. Where appropriate such Local Delivery Vehicles may also have close connections to benevolent local landowners, subject to robust constitutional structures ensuring that the greater public interest is served and protected.

2.110 Details on how the policy is to be implemented will be published within the Affordable Housing Supplementary Planning Document.

Proposed Changes to the Pre-Submission Core Strategy

Affordable housing exception sites....

Exceptionally, land adjoining or very close to the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed to facilitate affordable housing in order to provide affordable housing, in perpetuity provided that:

- ~~The housing comprises 100% affordable housing~~
- Secure arrangements are included to ensure that affordable housing its benefits will be enjoyed by successive as well as initial occupiers
- The proposed development would provide a mix of affordable housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment...

....East Dorset

- West Moors; St Leonards and St Ives; Colehill, Corfe Mullen, Three Legged Cross; Alderholt; Cranborne....

2.111 Consultation Response Table

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
28	0	24	6	4	3	2		

Table 2.5

2.112 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359277	Mr Jamie Sullivan	Tetlow King	PCCS106

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359547	Mrs V Bright	Town Clerk Verwood Town Council	PCCS62
359854	Mr T Graham		PCCS270
359860	Mrs P A Dent		PCCS209
359912	Mrs Barbara Huggins		PCCS48
474462	Mrs Sheila Bourton		PCCS24
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS34
485699	Mrs Janet Seal		PCCS187
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS485
619967	Mr James Stevens	Strategic Planner Home Builders Federation (South West)	PCCS113
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS502
657152	Miss Suzannah Bath		PCCS179
657154	Miss Katherine Bath		PCCS180
657160	Mr Richard Bath		PCCS177
657163	Ms Wendy Grace		PCCS182
718915	Mr Darren James Goodwin		PCCS186
718923	Mr Harold Seal		PCCS194
718926	Mr & Mrs T Martin		PCCS197
718927	Mr Alan Philip Rowett		PCCS206
718929	Mrs Suzanne Jane Rowett		PCCS207
718931	Mrs Lesley Glynis Goodwin		PCCS210
718933	Mr Stephen George Goodwin		PCCS211

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
718934	Mr Mark James Huggins		PCCS213
718935	Mr Robert Holly		PCCS215
718936	Mrs Jennifer Holly		PCCS216
719083	Mr Philip Michael Strong		PCCS255
719085	Mrs Valerie Spence		PCCS257
719189	Ms Susan Barbara Huggins		PCCS275
719550	Mrs Jean Loader		PCCS333
719556	Mr P.D.G Loader		PCCS334
719570	Mrs Amanda Jane Oakley		PCCS344
719604	Mrs W M James		PCCS358

Summary of Responses

2.113 1/. Changes to the list of eligible settlements

2.114 The additional inclusion of Colehill Parish as eligible for exception sites.

2.115 The additional inclusion of Corfe Mullen as eligible for exception sites.

2.116 Generally increasing the settlement scope for exception site policy.

2.117 Councils' Position

2.118 It should be noted that of 25 respondents, 23 expressed support in favour of including Colehill Parish within the eligible list of Parishes, creating a potential future supply of housing to meet local need.

2.119 The revised list of eligible Parishes was extended to include Colehill and Corfe Mullen to increase the scope for the maximum use of exception policy in settlements both within the rural areas, but also where boundaries adjoin rural areas. A step that was made possible through the less prescriptive definition of rural settlements within the NPPF, but that also reflected the level of public objection to the former draft Core Strategy (in the case of Colehill) and to achieve consistency (by including Corfe Mullen).

2.120 2/. Broadening scope for exception sites to 'very close' to development boundaries

2.121 Respondent welcomed this revision but further detail required to define 'very close'.

2.122 3/. Changes reducing explicit restrictions to 100% Affordable Housing (thereby creating scope for some market housing)

2.123 Ambiguous concerns at revised policy wording.

2.124 Welcomes the revised policy wording.

2.125 That the Policy does not go far enough to permit market housing.

2.126 Councils' Position

2.127 At the present time the Council does not intend to positively word Policy LN4 to permit market housing as a part of exception site policy, considering that doing so would undermine the prospect of achieving 100% affordable housing exception sites, as have been provided across East Dorset in the distant and recent past.

2.128 However, it was also recognised that previously proposed policy wording - that would have explicitly prevented any scope for cross-subsidy within such schemes - should be removed, to permit long-term flexibility within the policy and the possibility of cross-subsidy on a highly controlled basis, as suggested within the NPPF.

2.129 In addition to the policies listed below representations have been received to the following preceding paragraphs of the Schedule of Proposed Changes.