



Core Strategy Submission

Consultation Response Analysis by Topic

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 provision of 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

How was the Christchurch and East Dorset housing target derived?

The Core Strategy Vision

2.1 Pre-Submission Policy

...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. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area. Housing will also continue to be delivered from redevelopment within the existing towns, but developments will now better reflect the character and type of housing found in each local area, and will make appropriate contributions to infrastructure. Almost all new housing development will contribute to the provision of affordable housing, creating a step change in delivery of affordable dwellings and a significant reduction in waiting lists....

2.2 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	Yes	No	Yes	No	Yes	No	Yes	No	
12	6	6	28	16	11	13	18	16	14	13	14	21

Table 2.1

2.3 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS902
359277	Mr Jamie Sullivan	Tetlow King	CSPS2655
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1305
359478	Mr Rohan Torkildsen	English Heritage	CSPS2732
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2467
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS391
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1557
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3216
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3217
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2706
510796	Mr Rollo Reid		CSPS2712
523531	Mr Tim Hoskinson	Savills	CSPS2109
524723	Mr John Worth	Wimborne Civic Society	CSPS1890

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS1909
653603	Mr Malcolm Edmund Parsons		CSPS573
653852	Mrs Susan Newman-Crane		CSPS716
654320	Mrs Meghann Downing	Highways Agency	CSPS747
654456	Mr Elliot Marx		CSPS957
654686	Mrs J E Francis		CSPS773
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS826
654704	Mrs J E John		CSPS1047
655432	Mr Andy Davies		CSPS1017
655526	Mr Paul Morrison		CSPS1029
656228	Mr Adrian Dwyer		CSPS2466
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2756
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1466
656567	Mr Michael D Chappell		CSPS2851
656650	Mrs Patricia Fear		CSPS2438
656664	Mr Glen Morrison		CSPS2452

2.4 Summary of Responses

- Christchurch is being ruined by development for outsiders.
- Insufficient housing is being provided in the Core Strategy.
- 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.

2.7 The wording is proposed to be amended to reflect the delivery of housing in villages.

Proposed Changes to the Pre-Submission Core Strategy

....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. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area.

Housing will also continue to be delivered in our towns and villages, ~~from redevelopment within the existing towns~~, but developments will now better reflect the character and type of housing found in each local area, and will make appropriate contributions to infrastructure. Almost all new housing development will contribute to the provision of affordable housing, creating a step change in delivery of affordable dwellings and a significant reduction in waiting lists....

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					
14	25	2	39	33	37	36	35	6

Table 2.2

2.9 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS309
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS245
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS440
476036	Mr Colin Jamieson		PCCS160
490815	Mrs Trish Jamieson	Clerk Burton Parish Council	PCCS477
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS256
653852	Mrs Susan Newman-Crane		PCCS98
654046	Mr David Pardy		PCCS139
654456	Mr Elliot Marx		PCCS223
654660	Ms Anne Mason	chair Transition Town Christchurch	PCCS166
654962	Mr Christopher Chope		PCCS374
656832	Mr Paul Ramsey		PCCS283
662364	Mr Peter Fenning		PCCS317
662364	Mr Peter Fenning		PCCS281
662668	Mr & Mrs A Atkins		PCCS169
663076	Mrs Sheila Richards		PCCS123
691333	Mr B.F Sherry		PCCS314
718880	Mr Stephen Robson		PCCS222
718913	Mr Denis Daly		PCCS181
719393	Mrs Kathleen Roberts		PCCS287

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
719400	Terry Tuck		PCCS290
719401	Mrs Maureen Fisher		PCCS291
719409	Jacquetta Morris		PCCS292
719411	Mrs Jane Low		PCCS293
719418	S Rogers		PCCS296
719435	Mr Peter Smith		PCCS301
719463	Mrs B Mullins		PCCS305
719475	Mrs Eileen Ward		PCCS306
719483	Mr James Cain	Planning Consultant Coles Miller Solicitors	PCCS312
719484	Peter Mark Fisher		PCCS310
719490	Mrs Eileen Gay		PCCS311
719499	Mr Nigel Morris		PCCS313
719516	Liz Evans		PCCS325
719520	Mrs Georgina Sherry		PCCS328
719569	Mr Rob Evans		PCCS339
719572	Mr Paul Roberts		PCCS346
719575	Mrs Emily Graves		PCCS352
719579	Mrs Rosemary Hacker		PCCS353
719597	Mr Gerald Hacker		PCCS357
719606	Mrs Karen Pigott		PCCS360
719610	Ms Jane Susan Fitzpatrick		PCCS361

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
720046	Mrs Stephanie King		PCCS421
720136	Mr Roger Theodore Crispin Street		PCCS426

2.10 Summary of Responses

- The reference to housing delivered in towns and villages should be linked to proportionate evidence and to a local needs assessment.

2.11 Councils' Position

2.12 References to the evidence supporting housing requirements is set out in detail in Section 4 of the Core Strategy, and it is not considered appropriate to set out this detail here. Similarly, the additional wording in respect of the ageing population already refers to the sort of housing and infrastructure needed to support this population.

Objective 5: To deliver a suitable, affordable and sustainable range of housing to provide for local needs.

2.13 Pre-Submission

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.

2.14 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	
2	1	1	8	3	2	5	2	5	2	5	2	3

Table 2.3

2.15 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

2.16 Summary of Responses

2.17 The comments from key stakeholders and the general public in respect of this Objective have been grouped together into various themes and are as follows:

2.18 *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.

2.19 *Housing supply*

- Objection to the use of the phrase "reduce local needs", as it was felt that the NPPF requires local authorities to "meet local housing needs".
- Strategy is unsound since it has included land in Green Belt without seeking to work with neighbouring authorities to see if housing requirements can be met in adjoining areas.

2.20 *Representations on policy for rural areas.*

- These generic representations considered that there was a lack of vision for the rural areas and that the impact of housing and in-migration of urban dwellers was changing the character and community in rural areas.

2.21 *Housing at Burton*

- It was felt that housing proposed at CN2 would damage the character of the village, but an affordable housing exception scheme could be supported.
- There is a failure to explain how the housing proposed will meet the specific needs of the village.

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

2.23 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.

2.24 Justification for housing at Burton is set out in Chapter 6. The representations on rural policy do not seek a specific change to the wording of this Objective.

2.25 Additional wording is however proposed in response to representations seeking greater emphasis placed on the needs of the elderly and retired population. Wording has been added to the Vision on this issue and further wording is proposed to Objective 5 to indicate the objective of providing housing which can meet people's needs at different stages of life.

Proposed Changes to the Pre-Submission Core Strategy

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, **and will include housing capable of meeting people's needs at all stages of life**. 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.

2.26 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					
1	1	2	1	1	1	1	1	

Table 2.4

2.27 List of Consultee Reference Numbers

2.28 Summary of Responses

2.29 This objective was largely supported apart from one representation which considered that overall provision of affordable housing was too low.

2.30 Councils' Position

2.31 The overall levels of affordable housing have not changed from the Pre-Submission document. The support for this change is welcomed.

Housing Provision in Christchurch

2.32 Pre-Submission

Policy KS3

About 3,020 new homes will be provided in Christchurch between the years 2013 and 2028. This will comprise up to 2,035 homes within the existing urban area and a further 850 homes to be provided as an urban extension at Roeshot Hill, 90 homes to the east of Marsh Lane and 45 homes to the south of Burton. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.

2.33 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	5	0	21	12	5	9	8	12	4	12	5	27

Table 2.5

2.34 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359277	Mr Jamie Sullivan	Tetlow King	CSPS2647
360149	Mr John Urquhart		CSPS86
360792	Miss Carol Evans	Evans & Traves LLP	CSPS3247

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3668
507477	Mrs Sally Owen		CSPS1846
510796	Mr Rollo Reid		CSPS2716
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3647
523319	Mr Ryan Johnson	Turley Associates	CSPS3776
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3677
647876	Mr Christopher Whitcher		CSPS121
647898	Mr Derek Beasley		CSPS112
651766	Mr Mark Farrant		CSPS428
653227	Mrs Wendy Bailey		CSPS686
653576	Mrs Sue Ellis		CSPS1118
653603	Mr Malcolm Edmund Parsons		CSPS576
654588	Mr Keith Hayman		CSPS798
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS880
654704	Mrs J E John		CSPS1051
654730	Mr Luke Siemaszko		CSPS789
654775	Mr David Monks		CSPS887
654775	Mr David Monks		CSPS3471
654854	Mrs Jeannie Seymour		CSPS2869
654962	Mr Christopher Chope		CSPS915
655432	Mr Andy Davies		CSPS1020

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
655526	Mr Paul Morrison		CSPS1035
656228	Mr Adrian Dwyer		CSPS2473
656228	Mr Adrian Dwyer		CSPS3598
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2761
656426	Mrs Pauline Pritchard		CSPS2723
656542	Mrs Deidre Harding		CSPS2839
656567	Mr Michael D Chappell		CSPS2858
656629	Mr John Campbell	Roeshot Hill Allotment Association	CSPS3508
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS3168
656650	Mrs Patricia Fear		CSPS2440
656664	Mr Glen Morrison		CSPS2456
656794	Pam Higginson		CSPS3516
656867	Mrs Alison Ramsey		CSPS1723
657462	Ms Carla Fulgoni	The Planning Bureau Limited	CSPS2348

2.35 Summary of Responses

2.36 *Need for Additional Housing / Land Supply / Duty to Co-operate*

- There is nothing in this plan or any other that has been put forward for South East Dorset since 1947 which has been able to meet the demand from financially disadvantaged sectors of the community to live in areas attractive to those able to price them out of the market.

- **Tanner and Tilley Planning Consultants** – it is considered that para 4.16 should acknowledge not only that the population of the Plan area is ageing but that there is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs.
- **Jamie Sullivan (Tetlow King)** -There is a need for the Council to make up the shortfall in provision over the last 5 years in addition to the housing requirement currently set out in the Core Strategy. Strategic Housing Market Assessment: There is a need to provide for 332 affordable dwellings per annum. The target of 40% affordable housing will not deliver sufficient housing to meet the need. As demonstrated, the proposed housing target does not meet the objectively assessed housing need and the Local Plan does not set out any 'adverse impacts' which would outweigh delivering a larger provision of housing. The Council will need to assess whether it can deliver a higher level of housing to ensure it is sound and positively prepared as per the requirements of the NPPF.
- **Tom Whils (TOR)**- Policy KS3 does not meet the housing need identified in the Strategic Housing Market Assessment (355 dwelling shortfall). A holistic approach should be taken with East Dorset in order to meet the housing requirement identified in the Strategic Housing Market Assessment. The overall housing allocation in East Dorset should be increased from 5,250 to 5,605 in order to meet the shortfall in Christchurch. The authorities may wish to consider allocating one or more 'overflow' sites specifically to meet the additional housing requirement arising from Christchurch. The Perry Family Trust holds land which could be made available as a suitable additional allocation to meet the overflow requirements arising from Christchurch.
- Policy KS3 conflicts with strategic Objective 5 - in delivering a suitable affordable and sustainable range of housing to provide for local needs. Sufficient housing will be provided in Christchurch and East Dorset to meet local needs. Not meeting the Strategic Housing Market Assessment requirement fails to comply with this Objective.
- **Lisa Jackson (Jackson Planning)** -The Core Strategy must address objective housing needs as they are identified. The Core Strategy must address a more positive and proactive approach to affordable delivery that is sensitive to market conditions as required by the NPPF. The Council must look at other solutions to do this. For example an increase in allocation at Burton could lead to greater delivery of affordable housing in the early part of the plan period which goes some way to meeting needs. The delivery of housing and in particular the need to boost supply as required by the NPPF is not being addressed in the early part of the plan period. MEM have proposed an alternative solution that would boost supply in the first 5 year period of the Core Strategy and have provided evidence to show how the site at Burton can deliver more housing within the plan period.
- **Carol Evans (Evans and Traves)** -Increase the 5 year portion of the housing target by 20%. There has been a persistent case of under delivery on the 5 year housing supply
- The Strategic Housing Land Availability Assessment is a flawed piece of evidence as it includes back gardens. Paragraph 48 of the NPPF states that 'Strategic Housing Land Availability Assessments...should not include residential gardens.' It is therefore considered that the 5 year and subsequent years housing supply is overly optimistic in the context of this methodology.

- Reliance on the identified urban extensions through the post 5 year period in the Strategic Housing Land Availability Assessment will not comply with the objectives on the NPPF as it will not ensure choice and competition in the market for land. (Para. 47 of the NPPF).
- The Strategic Housing Land Availability Assessment is unsound and cannot be justified and is unlikely to effectively deliver the level of needed housing both market and affordable.
- **Ryan Johnson (Turley Associates on behalf of Burry & Knight)** - The Council has not tabled sufficient evidence as yet to meet the NPPF requirement to 'objectively assess' their housing need, including any unmet requirements from adjoining authorities (NPPF 182). Nor have the Council assessed and consulted on alternative ways of meeting such housing needs either within or outside the borough through the duty to co-operate requirements of the Localism Act and the NPPF.
- **Savills on behalf of Canford Estate and Harry J Palmer** - Paragraph 4.18: It is unclear how the housing target has been reached, or if any allowance has been made for second homes and vacancy rates. It is potentially a significant underestimate of the true housing needs of the area. The housing figure is a projection forward of past demographic trends and should be considered alongside other indicators of housing need and demand such as affordability and economic growth targets.
- Believe that we need to meet Strategic Housing Market Assessment target of 332 affordable units per annum. We have reviewed the council's evidence base and cannot find any evidence to suggest that they have explored and consulted on a range of options to meet the identified need of 332 units per year.
- The Council will need to provide evidence to justify why they have only assessed a single trend based option of 225 homes per year. The Council have not produced and tested alternative options to this, particularly ones that factor in employment growth. Christchurch's provision is 355 short of the Strategic Housing Market Assessment figure.
- The Council needs to obtain evidence to demonstrate that all potential identified in the Strategic Housing Land Availability Assessment is available and achievable during the plan period. Assess what the objectively assessed need is in relation to the unmet need of other local planning authorities. Why the Council is unable to accommodate more than 201 dwellings per annum
- Residential garden land should not be included within the Strategic Housing Land Availability Assessment in accordance with paragraph 48 of the NPPF. These types of site fall under the definition of 'windfall' under paragraphs 47-49 of the NPPF. This does not satisfy the soundness tests of the NPPF in terms of being effective and deliverable.
- The Council has not consulted on alternative options to development at Roeshot Hill, East of Marsh Lane or South of Burton.
- The evidence base informing the policy should be updated as indicated above. Further consultation should be undertaken on this, along with any material revisions to the plan that may arise from this.

- **Home Builders Federation South West** - The assessment of the housing need over the plan period does not meet the requirements of the Framework as set out in paragraphs 47 and 159 in terms of assessing market as well as affordable housing needs. The planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. The proposed housing requirements fail to take account cross boundary impacts including unmet needs of neighbouring authorities. The Strategic Housing Market Assessment fails to meet the Core outputs set out in the DCLG Practice Guidance (2007). The reports fail to identify market and affordable housing needs. For Christchurch the annual requirement for affordable housing provision is 332. It is not clear how the figures for projected housing growth at 219 per year relate to affordable housing requirements. The affordable figure should be added to the market figure 332 + 219? NPPF 47 and 159, Objectively assessed needs are not being met.
- The expression of housing targets set out in KS3 and KS4 is imprecise and creates uncertainty. The expression of housing figures needs to be precise. The use of the word 'about' needs to be deleted. The targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions in the framework, these will enable the councils to exceed the targets.
- **Tanner and Tilley** - There is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs. Christchurch are unable to demonstrate a 5 year land supply or the additional 5% buffer required by the NPPF. Strategic Housing Land Availability Assessment assumes that the majority of development will be 30dph minimum which has been removed from national policy. Reliance on a high level of windfall development questions whether this is deliverable in addition to development on garden land which will be resisted. We consider that the local authority needs to revisit the evidence base and to more realistically identify how it will provide for delivery of a 5 year housing supply together with an additional buffer of 5% to accord with the requirements of the NPPF.

2.37 *Housing Trajectory*

- **Home Builders Federation South West**

The plan is unsound as it is inconsistent with the framework since it does not include a housing trajectory or a housing implementation strategy that shows how the councils will maintain delivery of a five year housing supply. This is a requirement of the framework (paragraph 47).

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

2.39 In accordance with the NPPF, Core Strategy policies KS3 and KS4 will be amended to provide a single policy and housing figure for the plan area which will also provide a 5% buffer to the 5 year housing land supply and enable a 5 year housing supply to be demonstrated across the district and borough. Paragraph 47 of the NPPF refers to a requirement to provide a 20% buffer when there is a persistent under delivery of housing. In examining housing delivery in Christchurch it is important to look at a reasonable time frame. Over the Structure Plan period (1994 - 2011) there was a requirement to deliver 2,000 net new dwellings and over this period Christchurch delivered 2,552 which exceeded the Structure Plan target by 552. The draft Regional Spatial Strategy for the South West proposed a housing target of 3,450 for the period 2006 - 2026 which equates to 173 dwellings per year. As of 2007

onwards Christchurch has not demonstrated a 5 year land supply in relation to the draft Regional Spatial Strategy figures and subsequently the Pre Submission Core Strategy housing figure based on the 2012 strategic housing market assessment. However, on balance it is considered over the period 1994 - 2012 that there has not been a 'persistent under delivery of housing' and that a 5% buffer to the 5 year land supply is appropriate.

2.40 In East Dorset the Structure Plan housing requirement was met. Despite the Council objecting to the draft Regional Spatial Strategy it has demonstrated a 5 year land supply as well as in relation to the housing figure contained in the strategic housing market assessment and the Dorset County Council household projections (based on the 2011 census). Additional detail in this respect is set out in response to the comments on KS4 below. It is therefore appropriate to apply a 5% buffer to the 5 year land supply.

2.41 Paragraph 48 of the NPPF refers to windfall allowances and that where a windfall allowance is included in the Strategic Housing Land Availability Assessment this should not include residential gardens. The Strategic Housing Land Availability Assessments do not include a windfall allowance and all sites are specifically identified and their impact and deliverability assessed in 5 year land supply. Some of the identified sites do involve the loss of garden space, but only where this does not adversely affect the character and amenity of the area.

2.42 The Strategic Housing Land Availability Assessments have taken an exhaustive street by street approach to the identification of sites in the existing urban area which has also considered some potential on selected commercial sites. In this respect there is no further housing potential to be unlocked within the existing urban area. The suitability, availability and achievability of the sites in the Christchurch and East Dorset Strategic Housing Land Availability Assessments have been assessed in accordance with the NPPF.

2.43 Evidence to demonstrate the objectively assessed housing need is set out in the Councils' Strategic Housing Market Assessment Update (2012) and figures which have been produced by Dorset County Council in the light of new census data. In accordance with the Duty to Co-operate the Councils have worked jointly with neighbouring authorities to assess housing needs over the Bournemouth and Poole Housing Market Area through production of the Strategic Housing Market Assessment and updated Dorset County Council housing figures. The County figures have been calculated using new data from the 2011 Census which estimate that household growth for the plan area is about 500 dwellings per year. This is lower than the Strategic Housing Market Assessment Update (2012) which estimated the household growth figure being 575 dwellings per year and substantially lower than the first Strategic Housing Market Assessment which estimated household growth at about 800 dwellings per year. All of these figures represent estimates and it is clear that changing data is resulting in variations. On this basis the proposed housing target for the plan period lies within the range of the estimates.

2.44 Christchurch and East Dorset Councils are able to meet the objectively assessed housing needs identified in the updated DCC figures through a joint housing figure which will supersede current policies KS3 and KS4. Neighbouring authorities are at differing stages in the production of Core Strategies / Local Plans. Bournemouth, Poole and New Forest District Councils have adopted Core Strategies and Purbeck District Council has completed their examination. Wiltshire has submitted its Core Strategy and North Dorset are able to meet their objectively assessed housing needs within their district and the New Forest National Park has a very low housing target which can be met in their district. Additionally, neither North Dorset or Wiltshire are within the same Strategic Housing Market Area as they border the sparsely populated rural parts of East Dorset. Christchurch and East Dorset Councils will work closely with neighbouring authorities through Local Plan updates to meet ongoing housing requirements across the Bournemouth and Poole housing market area.

2.45 The Strategic Housing Market Assessment Update (2012) identifies that the absolute housing need figure across the plan area, if all needs are to be met, is about 770 dwellings. If this scale of delivery represented 35% of all housing delivery the plan target would be 2,200 dwellings per year (33,000 over the plan period). This scale of delivery is not achievable as it would have a major environmental impact. On this basis the housing figure has been calculated in terms of household growth over the plan period through trends analysis.

2.46 In addition to sites identified in the Strategic Housing Land Availability Assessments two Green Belt sites have been identified for housing development in Christchurch. In East Dorset four main areas of search for new neighbourhoods have been assessed on the edge of Corfe Mullen, Wimborne/Colehill and Ferndown/West Parley, along with smaller ones at Verwood. A total of 12 new neighbourhood housing sites have been identified in the pre-Submission document. A further 18 have been put forward as alternatives, or in addition to these, all of which have been assessed previously and not taken forward. There are no other Green Belt sites to consider as alternatives which have not already been assessed and dismissed as part of an earlier consultation stage.

2.47 The Core Strategy will be revised to include a policy that addresses the issue of specialist housing and care facilities. Further discussion of this issue is set out in the response analysis for the Meeting Local Needs chapter.

2.48 Housing densities considered in the Strategic Housing Land Availability Assessments have been determined in relation to densities that are appropriate for the character of local areas and reflect historical housing delivery that has been monitored through the Annual Monitoring Report. The NPPF also sets out a requirement for local authorities to meet their objectively assessed housing needs in full and a significant reduction in housing densities would fail to meet the projected requirements identified in the Strategic Housing Market Assessment Update (2012). Core Strategy Policy LN2 states that a minimum density of 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Therefore, the policy approach is not overly prescriptive.

2.49 Housing trajectories are produced and monitored through the Councils' annual monitoring reports. Further detail will be included in the Core Strategy Infrastructure Delivery Plan setting out a housing implementation strategy, demonstrating how the Councils will maintain a five year land supply to meet the joint housing target.

2.50 Paragraph 4.17 - Amended text to reflect the recent household projections which in combination with the SHMA have informed the councils' housing target:

2.51 A housing strategy for Christchurch and East Dorset has been established for the plan period (2013 - 2028) informed by local evidence including the Bournemouth and Poole Strategic Housing Market Assessment (2012), **Bournemouth, Dorset and Poole Population and Household Projections (2012)**, Strategic Housing Land Availability Assessments (2011) and master planning work undertaken for new greenfield sites.

2.52 Paragraph 4.18 - Amended text to reflect the recent household projections which in combination with the SHMA have informed the councils' housing target:

2.53 The Bournemouth and Poole Strategic Housing Market Assessment (2012) provides an assessment of need for market and affordable housing. ~~In Christchurch the study identified re is a need for 3,375 new market and affordable homes and for 5,250 in East Dorset between 2013 and 2028. Further evidence has been prepared by Dorset County Council for Bournemouth, Dorset and Poole which provides population and household projections re based to new data from the 2011 census. Based on this data there is a need for 7,500 new market and affordable homes in Christchurch and East Dorset between 2013 and 2028. The SHMA and Dorset County Council data have informed a single housing target for the plan area. In order to provide additional flexibility and to give a tolerance for potential non delivery of some proposals, the joint housing target has been set at 8,200 dwellings. This provides flexibility of approximately 10% over and above the baseline need figure. This also provides some allowance for possible future changes in statistical data which affect household projections.~~ In establishing housing targets for Christchurch and East Dorset the assessment of housing need must be balanced against the level of housing that can be delivered sustainably. In this respect, the Strategic Housing Land Availability Assessments (2011) undertaken for Christchurch and East Dorset provide a detailed assessment of the capacity for housing development.

2.54 Paragraph 4.19 - The text has been amended as policies KS3 and KS4 will be replaced by a single policy and housing target which meets the overall housing requirement for the district and borough identified in the Bournemouth, Dorset and Poole Population and Household Projections (DCC, 2012),

2.55 In Christchurch there is capacity to build approximately 2,140 new homes in the urban areas and 2,800 in East Dorset over a 15 year period. This does not meet the needs identified in the evidence base referred to above Housing Market Assessment, so it has been necessary to identify sites in the Green Belt. ~~Even so, within Christchurch there is insufficient suitable land available to deliver the identified need set out in the Housing Market Assessment, due to the particular constraints of flood risk and proximity to heathland, which affect significant areas of the Borough.~~

2.56 Paragraph 4.20 - This text has been amended as the Christchurch Strategic Housing Land Availability Assessment does not apply a discounting rate.

2.57 ~~The Strategic Housing Land Availability Assessment reports do and will continue to take into account a discounting rate for the non-implementation of planning permissions in the existing urban area.~~

Housing Provision in East Dorset

2.58 Pre-Submission

Policy KS4

2.59 About 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and about a further 2,500 homes to be provided as new neighbourhoods. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.

2.60 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	
10	1	2	19	10	4	12	4	12	3	11	3	3

Table 2.6

2.61 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS905
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2093
359277	Mr Jamie Sullivan	Tetlow King	CSPS2671
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2470
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1639
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2006
360692	Mrs Wendy Britton		CSPS678
361170	Mr Tim Harvey		CSPS4011
490823	Mr Ian Jones	Ferndown Town Council	CSPS2966
503554	Mr D Verguson		CSPS4009
512360	Mr Richard Acres		CSPS4010
523319	Mr Ryan Johnson	Turley Associates	CSPS3294

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
523531	Mr Tim Hoskinson	Savills	CSPS2121
523531	Mr Tim Hoskinson	Savills	CSPS3190
524723	Mr John Worth	Wimborne Civic Society	CSPS1896
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3678
654506	Mr John Showell		CSPS811
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS881
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS771
654962	Mr Christopher Chope		CSPS916
655876	Mr James Moran		CSPS4012
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1087
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1472
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS3179
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3492
656692	Mr Robin Henderson	Ken Parke Planning Consultants	CSPS3627
657138	Mr Mike Hirsh	Intelligent Land	CSPS3214
657341	Mr & Mrs K Perry		CSPS4014
657372	Mr A.J Linehan	Brookside Manor Residents Association	CSPS4013
657462	Ms Carla Fulgoni	The Planning Bureau Limited	CSPS2351

2.62 Summary of Responses

2.63 The comments from key stakeholders and the general public in respect of this policy have been grouped together into various themes and are as follows:

2.64 *Need for Additional Housing*

- There is nothing in this plan or any other that has been put forward for South East Dorset since 1947 which has been able to meet the demand from financially disadvantaged sectors of the community to live in areas attractive to those able to price them out of the market.

Tanner and Tilley Planning Consultants – it is considered that para 4.16 should acknowledge not only that the population of the Plan area is ageing but that there is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs.

All the internal demand for new housing can be met from the release of houses from the ageing population as they pass on.

The excess demand for housing comes from migration. This should be tackled by building a New Town somewhere in Dorset for retired migrants coming into the area.

Housing Numbers

Mr Kenneth Brooks – makes reference to the NPPF requirement that the Strategic Housing Land Availability Assessment should not include residential gardens (para 48) and considers that this will result in the next Strategic Housing Land Availability Assessment for East Dorset showing a significant reduction in the potential for residential development in St Leonards and St Ives.

Savills, for Barratt David Wilson Homes, argue that paragraph 4.18 is unsound. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. They argue that the figures are based on a projection forward of past demographic trends and does not take account of other indicators of housing need and demand such as affordability and economic growth targets. In translating these figures into housing provision for the District, allowance also needs to be made for vacancy rates and second homes.

Tanner and Tilley Planning Consultants, for Pennyfarthing Homes – Policy KS4 relies on the delivery of the identified housing need through the provision of 2,800 of the 5,250 dwellings on existing brownfield sites. However, unless clear policy guidance is given within the Core Strategy accepting that the character of some of those areas will necessarily have to change in terms of density and appearance, and unless there is clear policy requiring minimum densities of at least 30 dwellings per hectare to be achieved, unless it is in areas specially designated as ‘special character areas of low density’, it is considered that this level of housing will not be achieved. The Core Strategy needs to make it clear that certain parts of existing residential areas will need to accommodate higher densities of development which may change their character and appearance.

Paul Newman Property Consultants - does not feel that the local planning authority has fully assessed the true level of housing need and demand in the district. Further allocation of land is required which will involve the need to roll back the Green Belt further to ensure that a sufficient supply of housing land is to be provided, in particular those allocations in Wimborne and Ferndown have and hold the potential for a natural expansion and continuation of development which will bring additional housing to the district.

Gleeson Developments Ltd. – support the proposed housing provision across the joint districts during the plan period, and support the proposed residential allocations within the Core Strategy. Gleesons recognise that there is a shortage of affordable housing in the area and suggest that if the councils were to increase their overall housing targets, then this would result in the provision of more affordable housing.

Barton Willmore – provide a detailed argument to demonstrate that the housing target set out in KS4 is not robust. They argue that the policy is unsound on the basis that it is neither fully justified with respect to evidence or in accordance with national planning policy, specifically the requirements to take account of economic signals and to meet household and population projections, taking account of migration and demographic change. It is therefore not 'positively prepared' in that it fails to address objectively assessed need. This policy required review and additional work undertaken to ensure it meets the requirements of the NPPF and the tests of soundness referred to above. At present it is considered that the policy fails to plan positively for economic growth and the high level of identified affordable housing need, and that insufficient regard has been and to net-migration trends, which would be likely to produce a housing demand figure in excess of the figures used to support the Core Strategy. They suggest that the Core Strategy housing requirements should be as a minimum the same as set out in the Regional Strategy – i.e. 6,400 new dwellings across the plan period. This figure was objectively assessed and in the absence of a robust alternative would represent a suitable benchmark and one founded on a robust evidence base.

West Parley Parish Council – The policy is unsound. The figure of 5250 new homes in East Dorset in the Plan period is not justified by evidence. The proposed scale of house building will destroy whole swathes of important Green Belt throughout East Dorset, and the Core Strategy uses a figure for which there is no realistic quantitative evidence and gives no reasons at all for its qualitative choice.

Savills, for Barrett David Wilson Homes, – the policy is unsound as it is not justified. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The recognition in policy KS2 of the need to provide extensions to the existing urban areas to meet development needs is welcomed. However, the evidence base suggests the need for new housing is potentially significantly higher than the level of housing provision set out in Policy KS4. The level of housing provision set out in policy KS4 should therefore be considered a minimum and the wording of the policy amended to state that 'At least 5,250 new homes

Tetlow King – comment that the proposed housing target will need to demonstrate that it will meet objectively assessed housing need to accord with the NPPF. They consider that the current target will not achieve this, based on figures in the 2011 Strategic Housing Market Assessment, which states that the demographic growth is 6,714 households between 2011 and 2031 (336 households per annum) and 440 affordable housing dwellings per annum. Therefore the target of 350dpa is not sufficient to meet this need, even taking into account overlap between the affordable and demographic figures. They therefore recommend that the Council assess a much higher housing target given the findings of the 2011 Strategic Housing Market Assessment, in order to ensure this policy is sound and positively prepared as per the requirements of the NPPF.

Ferndown Town Council – Lack of information about numbers of people who are on more than one local authorities' housing register needs to be rectified since this deficiency may lead to an exaggerated housing need for S E Dorset.

Terence O'Rourke Ltd, for the Perry Family Trust, – Policy KS4, setting the housing requirements for East Dorset, meets the housing need for the district as determined through the Strategic Housing Market Assessment, however the housing target for Christchurch is set below the figure in the Strategic Housing Market Assessment to the extent that there would be a shortfall of 355 dwellings within the borough over the plan period. They argue that in order to ensure that an appropriate level of housing can be delivered across both districts, the overall housing allocation for East Dorset should be increased from 5,250 to at least 5,605 for the plan period, in order to meet the shortfall of housing in Christchurch. This change should be supported by an additional paragraph in the supporting text explaining that the increase in East Dorset is to meet the deficit from Christchurch. In order to ensure that such a policy change does not result in unplanned and speculative development within East Dorset, the authorities may wish to consider allocating one or more 'overflow' sites specifically to meet the additional housing requirement arising from Christchurch. The suitability of any overflow site should be assessed in terms of the normal plan making process.

Intelligent Land – Argue that the housing land supply is insufficient to meet local needs.

Turley Associates, for Taylor Wimpey, argue that the evidence base informing policy should be updated to meet the requirements of the NPPF, and that further consultation should be undertaken on this and any material revisions to the plan that may arise from this. The NPPF requires local planning authorities to objectively assess and meet the needs for market and affordable housing in their area, as far as is consistent with NPPF, including any unmet requirements from neighbouring authorities where reasonable and sustainable to do so. They argue that the housing needs assessment carried out by the council has not fully explored all the alternative options to meeting the needs identified in the 2012 Strategic Housing Market Assessment. No justification is given as to why the Strategic Housing Market Assessment figure of 426 dwellings per annum cannot be provided, and they consider that the 350 dwellings per annum included in the Core Strategy is a single trend based option. The Council has not produced and tested alternative options that factor in employment growth. The council also needs a robust Strategic Housing Land Availability Assessment to demonstrate suitable and available sources of housing land supply. They argue that the current Strategic Housing Land Availability Assessment does not do this. A significant proportion of the dwellings to be provided in the urban area identified on the Strategic Housing Land Availability Assessment are not confirmed as available, and many rely on the sub-division of existing housing units and building on residential gardens. The latter no longer has the status of previously developed land and should not be included in land supply calculations under para 48 of the NPPF. They consider that there is unlikely to be a 5 year land supply based on the Strategic Housing Land Availability Assessment data, and policy KS4 contains no contingencies to address such shortfalls. To accord with para 47 of the NPPF the Council should include a contingency strategy to address any future shortfalls in the 5 year land supply, which could include the interim release of additional sites to make up the shortfall. Turley Associates also argue that the Council have not objectively assessed housing need and have not then tested the various options to meet this need.

Pro Vision Planning and Design, for Wessex Water, suggest that the housing figure for East Dorset might be revised to include a greater level of housing supply in accord with the most recent evidence available.

Home Builders Federation – the proposed level of housing is unsound as it is deficient in several respects with regard to the requirements of national policy and the assessment of the housing requirement. It is deficient in respect to national policy in the following areas. (a) the assessment of the housing need over the plan period does not meet the requirements of the NPPF, as set out in paras 47 and 159 in terms of assessing market as well as affordable housing needs. (b) the planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. Consequently the proposed plan fails to meet one of the assessed levels of need, and (c) the proposed housing requirements fail to take into account cross boundary impacts including the unmet needs of neighbouring boroughs. The proposed plan has therefore failed to meet its own assessed level of need plus potentially the unmet needs of neighbouring districts. The HBF consider that given the disparities between the planned levels of provision and need they have identified in neighbouring authorities, Christchurch and East Dorset must meet their own objectively assessed housing needs through the plan since it is very apparent that they cannot rely on any adjoining authorities to do so. They are also concerned about the expression of the targets in KS3 and KS4 and consider them to be imprecise and to create uncertainty. The policy refers to ‘about x new homes’ The expression of the housing targets needs to be precise for the purposes of calculating 5 year land supply. The word ‘about’ should be deleted and the targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions of the NPPF, these will enable the Councils to exceed targets. The HBF also do not accept the argument that a weak housing market justifies reducing the housing requirement.

Ken Parke Planning Consultants, for Wilton Homes – The overall strategy of KS4 is supported, but there is insufficient detail and insufficient recognition of the need to plan for the levels of development that will be necessary to maintain the viability of smaller settlements.

Too many areas have been identified for development - we will end up with piecemeal housing in all of these without the other facilities provided that are necessary.

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

- **Housing Need** - The evidence base that underpins the Core Strategy housing figures.
- **Housing Land Supply** - Housing land supply based on Strategic Housing Land Availability Assessments to meet housing targets and 5% buffer in accordance with the NPPF.
- **Housing trajectories** - The incorporation of housing trajectories in the Core Strategy.
- **Housing targets and the Duty to Co-operate** - How the councils have worked with neighbouring authorities on identifying housing need and delivery of housing requirements.

2.66 With regard to the issue of a five-year land supply in East Dorset, the Council can demonstrate that it has successfully provided for the housing need of the District since at least 1994. The Structure Plan target during the period 1994 to 2011 was 4,400 (gross figure). During that time the number of actual completions in the District exceeded this target by 527 net new dwellings, which is a significant over-provision of units. It is recognised that the

rate of housing completions in the last 5 years has reduced to an average of 129 dwellings per year net, which is lower than the first 10 years of the Structure Plan period when on average 345 dwellings per year net were completed. This tailing off of provision represents the substantial completion of the allocated sites in the subsequent East Dorset Local Plan and the national fall in housebuilding rates due to the recession.

2.67 The Council considers that it has an adequate housing land supply to meet the needs of the area, and the 368 new dwellings per year needed to meet this target can be delivered. This is based on the number of extant planning permissions within the district (591), sites identified within the Strategic Housing Land Availability Assessment, and most significantly the number of dwellings proposed on greenfield sites in the Core Strategy. Discussions with a number of prospective developers of the allocated sites have indicated that there is the potential for a number of these sites to come forward for development within the first five years of the Core Strategy's adoption, subject to favourable economic conditions.

Proposed Changes to the Pre-Submission Core Strategy

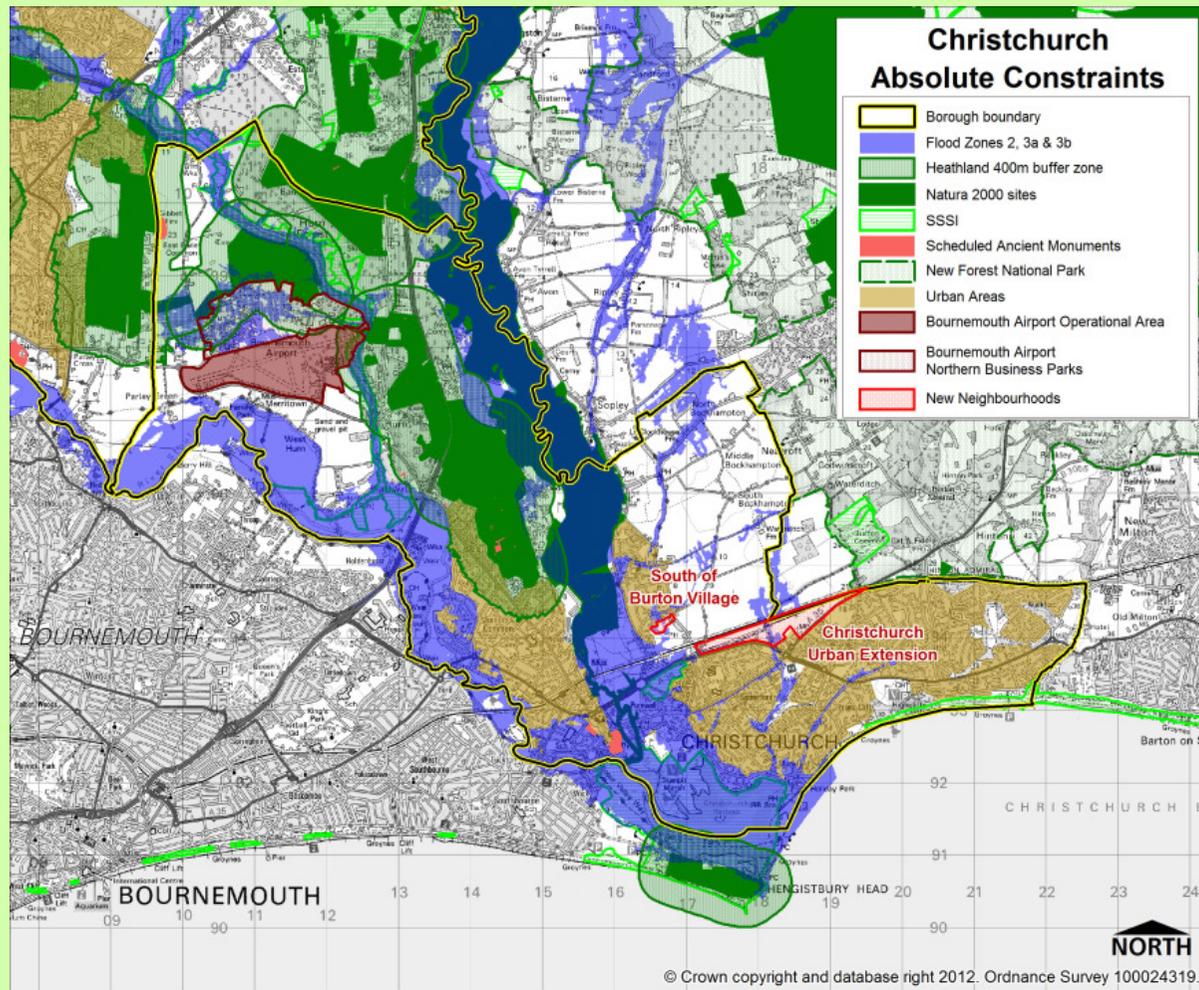
Paragraph 4.17 - A housing strategy for Christchurch and East Dorset has been established for the plan period (2013 - 2028) informed by local evidence including the Bournemouth and Poole Strategic Housing Market Assessment (2012), **Bournemouth, Dorset and Poole Population and Household Projections (2012)**, Strategic Housing Land Availability Assessments (2011) and master planning work undertaken for new greenfield sites.

Paragraph 4.18 - The Bournemouth and Poole Strategic Housing Market Assessment (2012) provides an assessment of need for market and affordable housing. **In Christchurch the study identified re is a need for 3,375 new market and affordable homes and for 5,250 in East Dorset between 2013 and 2028. Further evidence has been prepared by Dorset County Council for Bournemouth, Dorset and Poole which provides population and household projections derived from new 2011 census data. Based on this there is a need for 7,500 new market and affordable homes in Christchurch and East Dorset between 2013 and 2028. The SHMA and Dorset County Council data have informed a single housing target for the plan area. In order to provide additional flexibility and to give a tolerance for potential non delivery of some proposals, the joint housing target has been set at 8,200 dwellings. This provides flexibility of approximately 10% over and above the baseline need figure. This also provides some allowance for possible future changes in statistical data which affect household projections.** In establishing housing targets for Christchurch and East Dorset the assessment of housing need must be balanced against the level of housing that can be delivered sustainably. In this respect, the Strategic Housing Land Availability Assessments (2011) undertaken for Christchurch and East Dorset provide a detailed assessment of the capacity for housing development.

Paragraph 4.19 - In Christchurch there is capacity to build approximately 2,140 new homes in the urban areas and 2,800 in East Dorset over a 15 year period. This does not meet the needs identified **in the evidence base referred to above Housing Market Assessment**, so it has been necessary to identify sites in the Green Belt. **Even so, within Christchurch there is insufficient suitable land available to deliver the identified need set out in the Housing Market Assessment, due to the particular constraints of flood risk and proximity to heathland, which affect significant areas of the Borough.**

Paragraph 4.20 - ~~The Strategic Housing Land Availability Assessment reports do and will continue to take into account a discounting rate for the non-implementation of planning permissions in the existing urban area:~~

-



Map 4.2 Christchurch Absolute Constraints (PROPOSED CHANGE)

Policy KS 3

Housing Provision in Christchurch and East Dorset

About 8,200 new homes will be provided in the plan area between the years 2013 and 2028. This will comprise up to 4,800 homes within the existing urban areas and a further 3,400 provided as new neighbourhoods at Christchurch, Burton, Corfe Mullen, Wimborne/Colehill, Ferndown/West Parley and Verwood. The location of these strategic sites are identified in the relevant settlement chapters along with illustrative plans setting out how they can be delivered. Development briefs will need to be agreed with the Councils in advance of planning approval being granted for the new neighbourhoods, with the exception of the Christchurch Roeshot Hill urban extension where the Councils Masterplan is to be applied.

The Councils aim for a total of 35% of the new homes to be affordable, as defined in Appendix 2.

The Councils will carefully monitor the delivery of housing. If this falls significantly below the housing target set out in this policy the Councils will undertake a partial review of the Core Strategy.

~~About 3,020 new homes will be provided in Christchurch between the years 2013 and 2028. This will comprise up to 2,035 homes within the existing urban area and a further 850 homes to be provided as an urban extension at Roeshot Hill, 90 homes to the east of Marsh Lane and 45 homes to the south of Burton. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.~~

Policy KS 4

Housing provision in East Dorset

~~About 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and about a further 2,500 homes to be provided as new neighbourhoods. The Council aims for a total of 35% of these new homes to be affordable, as defined in Appendix 2.~~

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					
11	2	2	15	7	12	11	10	2

Table 2.7

2.69 List of Consultee Reference Numbers

2.70 KS3

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS435
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS427
359264	Mr Peter Atfield	Director Goadsby Ltd	PCCS419
359277	Mr Jamie Sullivan	Tetlow King	PCCS103
359291	Mr Jeremy Woolf	Woolf Bond Planning	PCCS366
359547	Mrs V Bright	Town Clerk Verwood Town Council	PCCS59
475144	Sophia Thorpe	Gleeson Strategic Land Ltd	PCCS173
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS497
523531	Mr Tim Hoskinson	Savills	PCCS200
523531	Mr Tim Hoskinson	Savills	PCCS191
619967	Mr James Stevens	Strategic Planner Home Builders Federation (South West)	PCCS111

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS473
654962	Mr Christopher Chope		PCCS378
657059	Mr and Mrs T R Beaumont		PCCS272
657138	Mr Mike Hirsh	Intelligent Land	PCCS65
714782	MR MALCOLM MAWBIEY		PCCS13
718577	Mr Richard Terry		PCCS136
718911	Mr Joshua Lambert	Planning Assistant Pro Vision Planning and Design	PCCS468
719394	Ms Jade Ellis	Assistant Planner Turley Associates	PCCS299

2.71 KS4

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359277	Mr Jamie Sullivan	Tetlow King	PCCS104
359547	Mrs V Bright	Town Clerk Verwood Town Council	PCCS60
523531	Mr Tim Hoskinson	Savills	PCCS201
523531	Mr Tim Hoskinson	Savills	PCCS192
654962	Mr Christopher Chope		PCCS379
657138	Mr Mike Hirsh	Intelligent Land	PCCS66

2.72 Summary of Responses

2.73 The comments from key stakeholders and the general public in respect of this policy and are summarised as follows:

- The housing requirement is unsound as it is justified by an evidence base that is not available for public scrutiny. It is troubling that the Councils have produced a new evidence base for the objective assessment of the housing need so late in the plan making process.

- The projections should be treated with caution as the 2011 ONS data they are based on has not been fully released and official mid-year estimates have not yet been included in the projection. The migration numbers included in the projections are described as 'experimental'. Also the approach of using past trends to project forward should be considered alongside other indicators of housing need and demand such as as affordability and economic growth targets. A 10% allowance also needs to be made for vacancy rates and second homes.
- Although the difference between the housing requirements in the Pre-Submission document and the proposed changes appears de minimis – (70 dwellings) the objective assessment in the proposed changes is for 7,500 dwellings, and the requirement only goes up to 8,200 once a 10% contingency has been added-on. It is also noted that the figure of 7,500 homes (less the 10% allowance) compares unfavourably with the evidence from the SHMA 2012 which appears to indicate a need for 3,285 homes in Christchurch and 5,040 homes in East Dorset between 2013 and 2028. This would make a total of 8,325 homes. If a 10% contingency is added to the SHMA figure of 8,325 then this would indicate the need for a housing requirement of about 9,157 dwellings (or rounded down to 9,150) over the life of the plan. The Framework requires that the objective assessment of housing need is conducted through the SHMA (paragraph 159). The Dorset County Council document does not satisfy the requirements of the Framework in this regard.
- Several representations suggest that the requirement should be 8,625, based on the SHMA estimates set out in the Pre-Submission document.
- An analysis of the additional homes required to sustain economic growth proposed in the Core Strategy has been excluded. There is also no analysis of unmet housing requirements from adjoining authorities under the Duty to Co-Operate. The housing strategy in the Plan should be developed in recognition of the role that Christchurch and East Dorset play in the wider Strategic Housing Market and Local Enterprise Area.
- The draft Regional Spatial Strategy should be taken into account when identifying a target as it has not yet been revoked.
- The use of a contingency is supported to enable the plan to be able to respond to potential changes in patterns of housing need. It also provides some flexibility which recognises that allocations could provide for more housing than proposed in the Plan.
- The housing target should be reduced to 7,500 and not increased by an arbitrary contingency.
- There is sufficient land with planning permission and identified in the SHLAAs, which means that no changes to the Green Belt are required. The policy should require development on previously developed land to be prioritised.
- The expression of the target is unclear as it is preceded by the word 'about', which means that a 5 year supply cannot be measured. The target should be a minimum
- The Plan should set out a clear housing trajectory.

- Each of the Council areas should have a separate target as the needs of each are different and serve different markets. The target may not be deliverable as it relies on two councils. It could result in the provision of housing being unfairly distributed, so that one of the councils accommodates some of the others requirement.
- Other representations support a single target.
- The predicted delivery rate will not be as high as predicted because the general economy is weak and CIL will make development less viable.
- The SHLAAs overestimate the potential delivery of housing as they allow for development in gardens and a large proportion of the supply is yet to be confirmed as available and therefore achievable in the plan period.
- There is too much reliance on the development of previously developed land with no evidence that this is viable.
- Development at Roeshot Hill will have a long lead in time as the pylons will need to be re-routed. This means that alternative sites need to be identified to ensure a five year supply of housing in Christchurch during the early part of the plan period.
- It is inappropriate for the policy to require a partial review to be undertaken if housing delivery falls significantly below the target. This shows the Plan has not been positively prepared.
- The policy should not insist that the Roeshot Hill Masterplan is to be applied, as this reduces the flexibility to investigate more effective ways to deliver a successful development.
- The housing strategy in the Plan should be developed in recognition of the role that Christchurch and East Dorset play in the wider Strategic Housing Market and Local Enterprise Area.
- The Councils have not tested alternative strategies for how to meet higher targets either by themselves or with the help of adjacent authorities. For instance the SHMA identifies affordable housing needs that are larger than the housing target set out in the Plan and means of meeting this has not been tested. In particular, there needs to be a strategy to boost housing delivery in the first five years of the Plan. The Councils plan to spread delivery evenly throughout the Plan period and this will not meet the backlog of unmet need.
- The housing requirement relating to East Dorset has been informed by the availability of land for housing rather than the needs. The Council has placed too much emphasis on environmental and policy constraint and does not appropriately balance this with social and economic factors.

2.74 Councils' Position

2.75 The Core Strategy has passed through a series of consultation processes where a range of housing delivery strategies have been investigated. The Plan area is heavily constrained, so opportunities are limited. It is considered inappropriate to increase housing targets beyond household growth requirements as this would cause unacceptable environmental harm and unduly compromise the purposes of the Green Belt. Nevertheless, the affordable housing policies and development proposals will provide an opportunity to significantly increase provision to meet local needs.

2.76 The housing target set out in the Proposed Changes is based on the most recent information provided to the Councils. This updates the Strategic Housing Market Assessment and is the latest of a set of assessments that have been made stretching back to 2005, when the Regional Spatial Strategy was first being prepared. The last iteration of the Regional Spatial Strategy identified a requirement across both authorities for 9,850 dwellings to be provided over the 20 years to 2026, at an average of 493 per year. The Proposed Changes target requires provision averaging 547 per annum. The target therefore shows a clear intent by both Councils to deliver housing to meet local needs.

2.77 The target allows for an element of contingency against predicted schemes not being brought forward. This is a generous allowance bearing in mind that recent history has shown a high rate of completion for schemes receiving planning permission or being identified in plans for housing.

2.78 The use of the word 'about' prior to the target reflects the iterative nature of delivering housing to meet housing requirements. New information as well as new circumstances e.g. economic, can unexpectedly affect the requirement and/or delivery of housing. The word therefore reflects an uncertain future and builds in a degree of flexibility, which historically in Dorset has been articulated as +/-10%. The maths required to identify a five year supply can reflect this range. It is correct for KS3/4 to refer to the need to keep housing delivery under review and, if there is a problem, to undertake a partial review. This again supports the understanding that the delivery of housing is uncertain and shows that the Councils are taking a positive approach to ensure that the needs of the community are met.

2.79 The housing target has been informed by the Strategic Housing Market Assessment (SHMA) prepared on behalf of all the Bournemouth, Dorset and Poole local authorities. This has identified a scale and distribution of housing that is reflected in the Core Strategy, subject to the update provided by DCC. All of the Councils have and continue to work closely in identifying the means in which to meet the housing requirements identified within the SHMA area. This is a complex process relying upon different Core Strategies. Nevertheless, these have progressed to reflect the SHMA and the Christchurch and East Dorset Core Strategy is set within this wider context.

2.80 The Councils have both produced detailed, robust and up to date Strategic Housing Land Availability Assessments. These show that a significant amount of housing can be provided in the urban areas, but this is not sufficient to meet the identified housing requirement. Therefore, there is a need to undertake a review of Green Belt boundaries in order to identify the most sustainable locations for housing outside the urban areas.

2.81 The Councils have agreed to use a single housing target to reflect the joint strategy proposed for the Plan area. This ensures greater certainty of delivery as there are more sites available to ensure a supply of housing. It also reflects a strong commitment to the duty to co-operate between the two Councils. There are examples of other joint core strategies where a similar approach has been used e.g. The Black Country.

2.82 The National Planning Policy Framework does not require Core Strategies to include housing trajectories. Recently we have seen locally that the Purbeck Local Plan Part 1 has shown a trajectory, whereas the Bournemouth Core Strategy has not, and both of these are adopted documents. The housing trajectory for the Plan is contained in the Councils' Annual Monitoring Reports. The Councils are confident that the identification of the new neighbourhoods and urban extension will lead to increased delivery at the beginning of the Plan period ensuring a five year supply of housing is available.

2.83 The Councils are fully aware of the current weak economy. However, the Core Strategy plans for a 15 year period and it is expected that economic circumstances will change over this time. The Core Strategy enables the delivery of housing and the policies in the Core Strategy are flexible enough to reflect economic circumstances.

2.84 The Roeshot Hill Masterplan is a comprehensive document and reflects how the Council considers the site can be best delivered to meet the needs of the Borough, whilst remaining viable. The master plan provides a framework to inform the planning application process and is not intended as a blueprint and as such allows for flexibility. The document does provide flexibility in the way that the site can be delivered, but sets important social, environmental and technical parameters within which this should occur.

Policy LN1: The size and type of new dwellings

2.85 Pre-Submission

Policy LN1

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Individual sites will be expected to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area.

All new housing will be required to be built to meet minimum living space standards for both internal and external areas. The Councils will produce a Supplementary Planning Document which will set out the detailed requirements of this policy. In the meantime the Councils will apply the Homes and Community Agency Housing Quality Indicators in relation to private open space, unit sizes, unit layout and accessibility within the unit.

2.86 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	
19	1	3	23	6	14	5	14	5	14	15	3	4

Table 2.8

2.87 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2099
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3578
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3544
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3982
359277	Mr Jamie Sullivan	Tetlow King	CSPS2704
359291	Mr Jeremy Woolf	Woolf Bond Planning	CSPS3815
359437	Ms Gill Smith	Dorset County Council	CSPS2018
359541	Mr Roger Lucas	Sturminster Marshall Parish Council	CSPS1899
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3415
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3416
474462	Mrs Sheila Bourton		CSPS192
523319	Mr Ryan Johnson	Turley Associates	CSPS3300
523319	Mr Ryan Johnson	Turley Associates	CSPS3785

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3689
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS898

2.88 Summary of Responses

• *Size and type of new dwellings*

- Sturminster Marshall Parish Council - Any further housing development needs to be of smaller units that are affordable for the younger population of the village.
- Tetlow King on behalf of South West HARP Planning Consortium - Policy should only be applied to sites of more than 20 units as beneath this level there is a danger that the policy could be used to micro manage the housing mix across the two local authority areas. Unless more detail is provided on how the policy might operate in practice the policy may add undue burdens to development and not accord with paragraph 173 of the National Planning Policy Framework (NPPF).
- Goadsby Ltd on behalf of Libra Homes, Seaward Properties Ltd and Sempcorp Bournemouth Water - Support the first part of the policy which accepts that needs identified in the SHMA have to be balanced against site specific circumstances and the character of the area. Paragraph 17 (5th bullet point) of the NPPF confirms that account must be taken of the different roles and character of different areas.
- Pennyfarthing Homes - Support general principle in first paragraph of Policy LN1.

Living Space Standards

- Environment TAG East Dorset - Welcome proposals but suggest rewording to read “All new housing will be required to be built to meet at least the minimum...”
- South West HARP Planning Consortium - Welcome introduction of Homes and Communities Agency Housing Quality Indicator Standards and applying them to all new development. However we could sound a note of caution for any standards higher than this being established through a Supplementary Planning Document as this would be contrary to paragraph 173 of the NPPF which states that “Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”.

- Goadsby on behalf of Libra Homes, Seaward Properties Ltd and Sembcorp Bournemouth Water - Imposition of minimum living space standards is unnecessary and unjust. It will reduce effectiveness of delivery of housing. Individual space standards were abandoned over 30 years ago. Imposes unnecessary burden on developers at a time the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. Suggest delete the second paragraph of Policy LN1.
- Home Builders Federation South West - The insistence on minimum dwelling standards will have significant implications for the viability of schemes. Any standards should be assessed at plan making stage to ensure they do not impair viability and implementation of the plan (paragraph 173 of NPPF). The viability of HQI should be assessed before submitting the plan. The affordable housing viability assessments make no such provision for the costs of HQI.
- Woolf Bond Planning - Second paragraph of policy is open ended, not sufficiently specific and does not provide effective or justified policy. The Mid Sussex standards have been subject to criticism from building industry due to excessive size of dwellings as a result. The inclusion of the policy will add to costs and damage the viability of future residential schemes.
- Turley Associates - Reference to interim application of the Homes and Communities Association indicators should be removed as they have not been informed by local circumstances. This is insufficiently flexible and prescriptive. If space standards are to be imposed at a local level, they should be consulted upon through the Supplementary Planning Document and not prescribed until this has been adopted.
- Minimum unit sizes proposed are contrary to the Council's desire to use land efficiently. The proposed loss and amount of valuable green belt land for new housing development could be reduced by building smaller units without compromising the living standards of new residents.
- Pennyfarthing Homes - Evidence base does not justify the imposition of living space standards.
- DCC - No reference to waste collection or recycling. The Homes and Communities Agency guidelines do not refer to space for storage or collection of waste. Developers should be aware of the space requirements for the recycling and rubbish collection service to be introduced across the county between October 2012 and 2015. Amend first sentence of second paragraph to read "All new housing will be required to be built to meet minimum living space standards for both internal and external areas, including allowance of space for the storage and collection of waste to meet local collection requirement".
- Pennyfarthing Homes - For new open market housing, living space standards should not be prescribed but should be a matter for the developer and their customer.

- Pennyfarthing Homes - The application of the Homes and Communities Agency Housing Quality Indicators to new open market housing is not legally compliant. The NPPF states that design policies should avoid unnecessary prescription or detail. It is considered that the application of space standards will stifle innovation, originality or initiative in the design of new dwellings.
- South West HARP Planning Consortium - Awaiting report back from Sir John Harman Commission on imposition of standards on new housing. Commission expected to report back to Grant Shapps later this year and may make policy on housing standards dated. Proposed policy is unsound as not consistent with national policy in paragraph 173 of NPPF.

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

2.90 Size and Type of New Dwellings

2.91 Evidence in the Strategic Housing Market Assessment supports a policy influencing housing size and mix on all sites. The majority of sites that are likely to come forward within the plan area would be under 20 units. If the policy only applied to sites of over 20 units, this would lessen opportunities to seek an appropriate size and mix of housing. There is flexibility within the policy with the wording "subject to site specific circumstances and the character of the local area."

2.92 Living Space Standards

2.93 The NPPF is clear that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings (para 17). Development must have regard to its impact on people's living conditions. This includes factors such as achieving acceptable levels of privacy, and ensuring sufficient internal and external space.

2.94 Evidence (CABE 2010) identifies that poor living space standards have detrimental impacts on health, well-being, education attainment, family welfare and antisocial behaviour. Consequently policies setting out minimum space standards have been adopted throughout London and elsewhere e.g. Bristol and Mid Sussex. The Mayor of London's Housing Design Standards Evidence Summary July 2010 provides strong evidence of why it is appropriate and realistic to apply living space standards

2.95 The principle of a policy for living space standards has been supported at previous stages of the Core Strategy, so there is evidence of local support for the introduction of a policy. On this basis it is considered appropriate to base a policy in the Core Strategy on application of the Homes and Community Association Housing Quality Indicators and further consideration be given to bespoke standards in a Supplementary Planning Document if justified by new evidence. The proposed policy only relates to two key aspects within the Indicators which are private open space and unit sizes, layout and internal accessibility (HQI sections 3.2.1 to 3.2.9 and 5.1 to 5.1.13). These are simple to assess and will ensure that residents have sufficient living space for comfortable and healthy living.

2.96 The policy, supported by the Supplementary Planning Document can provide a clear indication to developers of the factors that the Councils consider important in considering future housing proposals. The policy provides a basis for a methodology to assess issues relating to living space standards, to be set out in more detail in a supporting Supplementary Planning Document. The same approach has been used by Bristol City Council in their Core Strategy.

2.97 Analysis undertaken by the Councils has shown that a large proportion of planning permissions granted over recent years would have met the proposed standards. However, there were still sufficient to justify concern that dwellings are being built that offer poor living standards.

2.98 The Three Dragons Viability Report 2010 tested the economic implications of different amounts of planning obligations (£5,000 and £15,000) as well as an affordable housing contribution. It also considered separately the impact on viability of the introduction of Lifetime Homes Standards and Code for Sustainable Homes at code level 4. The assessment therefore provides a broad assessment of viability in the local area which is useful to inform development of affordable housing and space standards policy. Subsequently, viability testing has been applied to the proposed new neighbourhoods and urban extension which have taken into account the proposed standards. These have shown that the schemes remain viable. The Councils have also commissioned work to consider development viability in the context of charging a Community Infrastructure Levy. This will further update the evidence base.

2.99 The Council's understand that development must be viable for the developer and landowner. The costs associated with the proposed standards will be taken into account when negotiating the viability of schemes and S.106 costs.

2.100 The Supplementary Planning Document will contain specific details including the requirements relating to waste storage.

Proposed Changes to the Pre-Submission Core Strategy

The Size and Type of New Dwellings

2.101 Summary of Responses

2.102 No responses received.

Policy LN2: Layout and Density of New Housing Development

2.103 Pre-Submission

On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Strategic Housing Market Assessment, the master plan reports for new neighbourhoods and future Annual Monitoring Reports.

Proposals for high density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area and where residents have the best access to facilities, services and jobs:

- New greenfield housing sites (density range to be determined by outputs of master planning process).
- Town centres.
- Along the Prime Transport Corridors.
- Areas outside town centres with good access to public transport and essential facilities and services.
- In areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

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	
2	0	2	4	2	1	0	3	2	1	2	1	1

Table 2.9

2.105 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2100
359291	Mr Jeremy Woolf	Woolf Bond Planning	CSPS3816
360089	Ms Julie Goodman	Somerford Community Partnership	CSPS1984
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3417
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3419
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS901
654660	Ms Anne Mason	Transition Town Christchurch	CSPS972

2.106 Summary of Responses

• *General comments*

- Environment TAG, East Dorset - Welcome recognition of the need for new development to respect the character of the area.
- Environment TAG, East Dorset - Existing "character areas" do not apply to new neighbourhoods. There would be better acceptance of these large scale developments if local stakeholders were involved in early discussions about design options. Suggest additional words to paragraph 15.10. "Local stakeholders will be involved in the decision making process".

Minimum densities

- Pennyfarthing Homes - Concerned that as worded new housing development below 30 dwellings per hectare will be the norm rather than the exception. Policy should be strengthened to expect that new housing development will be provided with a minimum density of 30 dwellings per hectare and that only in exceptional circumstances will development be permitted below 30 dwellings per hectare .
- Transition Town Christchurch - Policy should acknowledge that brownfield sites should always be considered before greenfield. Greenfield sites should not be sacrificed as local food production will become increasingly vital.
- Somerford Community Partnership - Object to reference to areas where there is a high level of need for affordable housing/land owned by Housing Associations or where a housing association is the applicant. The need for affordable housing is accepted, but those in need should not be treated as second class citizens. This policy is likely to lead to the creation of high-density ghettos e.g. Scotts Green. Disagree that

housing associations should automatically be allowed to develop to a high density, particularly as there is a growing tendency for them to build market homes.

- Woolf Bond Planning on behalf of Taylor Wimpey Ltd - Policy places over-reliance on need for 'master plan reports for new neighbourhoods' to inform housing density. Suggest amendment to read "the indicative master plan reports for new neighbourhoods" to give additional flexibility to schemes as they develop.

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

2.108 The National Planning Policy Framework (NPPF) advises local planning authorities to set out their own approach to housing density to reflect local circumstances (paragraph 47). Previous changes to national policy removed references to a national minimum density of 30 dwellings per hectare and the requirement for local planning authorities to justify densities below the national minimum (PPS 3 amendments June 2010). The approach as set out in Policy LN2 is considered to be in line with NPPF policy as it encourages rather than requires a minimum density of 30 dwellings per hectare whilst retaining safeguards to ensure that there are no conflicts with local character and distinctiveness of an area.

2.109 The Strategic Housing Land Availability Assessments have identified that about 4,800 homes can be built within the urban areas and villages, to be delivered throughout the 15 year life of the Plan. This is not sufficient to meet the identified housing needs of the area. Housing delivery proposed in the Core Strategy therefore relies on development of both brown and green field sites. To ensure that there is a five year housing supply it will be necessary to allow some of the green field sites to be developed near the beginning of the plan period.

2.110 The Key Strategy chapter sets out policy for the broad location and scale of housing which conforms with the settlement hierarchy set out in Policy KS1. Those settlements which provide the best access to services, facilities and employment are to provide the key focus for development. The Green Belt will be retained and protected, except for strategic release of land to provide new housing.

2.111 The application of Policy LN2 does not mean that proposals for high density housing will automatically be allowed. Although the policy identifies types of location where proposals for high density developments will be acceptable, there are safeguards within the policy to ensure that new housing respects the local character and distinctiveness of an area. Proposals for new housing will also have to meet the criteria in Policy HE2 which sets out criteria for design of new development and addresses issues including scale, bulk and relationship to nearby properties.

2.112 It is considered that it is appropriate for the outputs of the master planning process to guide density ranges and this can be refined within Development Briefs (See Policies KS3 and KS4).

Proposed Changes to the Pre-Submission Core Strategy

2.113 None proposed.

Policy LN5: Location of Sites for Gypsy and Traveller Sites

2.114 Pre-Submission

Location of Sites for Gypsy and Traveller Sites

The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:

1. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, medical facilities and public transport;
2. Sites should provide for adequate on-site facilities for parking, storage, play and residential amenity;
3. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
4. Sites should not have an unacceptable impact on the amenities of adjacent occupiers; and
5. Sites should not result in a detrimental impact on the natural environment.

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

1. Well related to the public highway network to accommodate the safe passage of large vehicles and pedestrians.
2. Located so as to minimise the impact of on-site business activities on neighbouring properties,
3. Located so as to minimise the visual impact of the uses on the landscape.

2.115 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	
4	0	2	0	0	0	0	0	0	0	0	0	2

Table 2.10

2.116 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359437	Ms Gill Smith	Dorset County Council	CSPS2016
359437	Ms Gill Smith	Dorset County Council	CSPS2304
360082	Mr and Mrs K Healy		CSPS2515
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1570
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3424
524723	Mr John Worth	Wimborne Civic Society	CSPS1953

2.117 Summary of Responses

• **General comments**

- DCC - Significant differences between the wording, tone and approach of Policy LN5 and the Government policy in the Planning Policy for Traveller Sites” Matters referred to in Policy B (e.g. promotion of peaceful co-existence between site and local community) Policy C (need to ensure that scale of sites in rural or semi-rural areas does not dominate locality) and Policy D (consideration of inclusion of rural exception site policy for traveller sites) have not been addressed in Policy LN5. Suggest re-draft or delete and refer to the NPPF as the source of policy advice.
- Environment TAG (East Dorset) - Considerations achieve an appropriate balance for settled and travelling communities.
- DCC - Paragraph 15.19 - Reference to and links with the work of the Dorset Councils on Gypsies, Travellers and Travelling Show people is welcomed.
- DCC - Key Facts first and second bullet points should read “Dorset County Councils estimate” as estimates quoted are those agreed by all Dorset County Councils at the Dorset Authorities Joint Committee in October 2008.
- DCC - Key Facts Third bullet point should be amended to refer to private sites in each authority. Suggest additional words “but there are some private sites. The January 2012 caravan counts indicate some 4 pitches and Christchurch and 8 pitches in East Dorset have permanent planning permission for private caravans”.
- Paragraph 15.20 - this should be amended to refer to “Planning Policy for Traveller Sites”

AONB's

- Cranborne Chase & West Wiltshire Downs AONB - In the light of problems caused by traveller sites to sites and their immediate surroundings as well as damage to the verges of narrow roads and subsequent loss of rural character, Policy LN5 should exclude the AONB.

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

2.119 The Gypsies and Travellers Planning Policy Statement March 2012 sets out considerations to be included in a criteria based traveller sites policy, much of which are included in Policy LN5. Criteria could be added or existing criteria adapted to reflect issues raised in the Planning Policy Statement. The following amendments and additional criteria should be included to achieve greater conformity with the Planning Policy Statement.

2.120 *Amend criterion 1 to delete words "medical facilities" and replace with "health services"*

2.121 Insert new criterion "Sites should be located outside areas of high flood risk (zone 3 flood risk areas)."

2.122 *Insert new criterion:-*

2.123 "Development of a site in a rural / semi-rural area should be appropriate to the scale of its surroundings and existing nearby settlement"

2.124 *Insert new criterion*

2.125 "Alterations to the Green Belt boundary to accommodate sites will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances, and as part of the Site Allocations Development Plan Document, sites will be specifically allocated as a Gypsy and Traveller site only."

2.126 *Insert new criterion:*

2.127 *"In sites where mixed uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the occupants of the site or neighbouring properties".*

2.128 Amend key facts as suggested above.

2.129 Amend to read "Planning Policy Statement "Planning Policy for Traveller Sites" (March 2012) advises that the Core Strategy should set criteria to guide land supply allocations where there is an identified need."

2.130 The NPPF recommends that great weight should be afforded to protecting the landscape quality of the AONB. Policy HE3 has been amended to address this. It is not considered necessary to refer to the AONB in Policy LN5.

Proposed Changes to the Pre-Submission Core Strategy

2.131 Paragraph 15.20

2.132 ~~Circular 04/2007~~ The Planning Policy for Traveller Sites (2012) advises that the Core Strategy should set out criteria for the location of travelling showpeople sites which will be used to determine planning applications on unallocated sites that may come forward. ~~Annex C of the Circular~~ Paragraph 11 of the Planning Policy for Traveller Sites sets out good practise for criteria policies.

Location of sites for gypsy and traveller sites

The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:

1. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, ~~medical facilities~~ health facilities and public transport
2. Sites should provide for adequate on-site facilities for parking, storage, play and residential amenity;
3. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
4. Sites should not have an unacceptable impact on the amenities of adjacent occupiers;
5. Sites should not result in a detrimental impact on the natural environment.
- 6. Sites should be located outside areas of high flood risk (zone 3 flood risk areas)**
- 7. Development of a site in a rural / semi-rural area should be appropriate to the scale of its surroundings and existing nearby settlement**
- 8. In sites where mixed uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the occupants of the site or neighbouring properties.**
- 9. Alterations to the Green Belt boundary to accommodate sites will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances, and as part of the Site Allocations Development Plan Document, sites will be specifically allocated as a Gypsy and Traveller site only.”**

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

1. Well related to the public highway network to accommodate the safe passage of large vehicles and pedestrians;
2. Located so as to minimise the impact of on-site business activities on neighbouring properties;
3. Located so as to minimise the visual impact of the uses on the landscape.

2.133 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					
1	0	1	0	0	0	0		

Table 2.11

2.134 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS403

2.135 Summary of Responses

2.136 Dorset County Council support the proposed changes to reflect changes in government policy.

2.137 Councils' Position

2.138 Support noted.

Policy LN7: Housing and Accommodation Proposals for Vulnerable People**Pre-Submission**

2.139 No policy.

2.140 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					
1	0	1	0	0	0	0		

Table 2.12

2.141 List of Consultee Reference Numbers

2.142 Summary of Responses

2.143 Policy on Older People’s Accommodation-The Core Strategy should contain a policy on this due to the number of older people living in the area. The provision of accommodation for older people would free up larger houses allowing more efficient use of the housing stock.

2.144 Councils' Position

2.145 Policy on Older People’s Accommodation-Policy LN7 should be introduced on housing for vulnerable people.

Proposed Changes to the Pre-Submission Core Strategy

Housing and Accommodation Proposals for Vulnerable People

Category C2 health and care related development proposals

New social, care or health related development proposals, or major extensions to existing developments, within the C2 use classification will not be subject to Policy LN3 however they will be required to demonstrate that any impacts upon, or risks to, the strategic aims and objectives of Dorset County Council and NHS Dorset health and social care services have been taken into account and mitigated against.

Non C2 residential development proposals for older and vulnerable people.

All other residential development proposals for older and vulnerable people including sheltered housing, assisted-living and extra-care accommodation, must meet the requirements of policy LN3.

Subject to viability, open market development proposals to provide housing for older or vulnerable people will be required to meet policy LN3 through a commuted sum contribution, calculated in accordance with the approved methodology.

Specialist housing proposals for older or vulnerable people that seek to address the policy requirements of LN3 through on site affordable housing will be considered, however, the details of any such proposals and associated delivery mechanisms will require the prior approval of both the Council and Dorset County Council.

2.146 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					
3	0	2	2	3	3	0		

Table 2.13

2.147 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359277	Mr Jamie Sullivan	Tetlow King	PCCS107
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS405
619967	Mr James Stevens	Strategic Planner Home Builders Federation (South West)	PCCS114
657462	Ms Carla Fulgoni	Planning Assistant The Planning Bureau Limited	PCCS337

2.148 Summary of Responses**2.149 1/. Welcomed**

2.150 Without qualification (including Dorset County Council, the statutory body with responsibility for older and vulnerable people).

2.151 Welcomed but more robust enabling policy required.

2.152 Welcome the inclusion of the policy, but wish to see a more robust enabling policy presuming the positive determination of such housing. Especially so, given the demographic of the population and that the NPPF guidance requires the assessment of the group as part of SHMAs. The Council is also urged to review Housing in Later Life: Planning Ahead for Specialist Housing for Older People (on the HousingLIN website).

2.153 2/. The introduction of Lifetime Home standard requirements

2.154 That the proposed introduction of Lifetime Homes standards for larger scale developments and neighbourhood schemes is unsound, unjustified and contrary to national policy. That the cost of Lifetime Home Standards (two average costs quoted – one circa £3,000 per dwelling and one £1,525 per dwelling) have not been factored into viability assessments as a development cost (as required by the NPPF).

2.155 Councils' Position

2.156 The aim to “encourage the provision of homes which incorporate flexible and sustainable design principles, including the Lifetime Homes Standards” is not explicitly connected to new policy LN7, but is made as a general statement to be associated with all residential development proposals. In the interests of delivering more sustainable communities, and enabling lifetime flexibility, the Council will encourage the Lifetime Homes Standard and other sustainable design principles that contribute to affordable warmth.