



**Purbeck District Council**

**Affordable Housing Supplementary  
Planning Document – consultation  
statement**

## Table of Contents

1. Background.....	3
2. The approach taken to consultation and engagement .....	4
3. Who was consulted in the preparation of the SPD? .....	5
4. Summary of the main issues raised and how they have been addressed.....	7
Appendix 1 .....	13
Appendix 2 .....	14

## 1. Background

1. The Council has prepared this consultation statement in accordance with Section 12 (a) of The Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the consultation procedures relating to the production of the Affordable Housing Supplementary Planning Document (SPD). It sets out the following aspects:
  - The approach taken to consultation and engagement;
  - Who was consulted in the preparation of the SPD; and
  - A summary of the main issues raised and how they have been addressed.

## 2. The approach taken to consultation and engagement

2. The Council developed the SPD in accordance with the Council's adopted Statement of Community Involvement.

### Consultation period

3. The Council undertook a six week consultation between 3<sup>rd</sup> January and 14<sup>th</sup> February 2013. Prior to the consultation period starting, the Council wrote to all statutory consultees and other interested parties (see section 3 for details), detailing what the Council was consulting on, where to view material, how to obtain hard copies and where to submit representations.

### Availability of material

4. The Council made available all consultation material at the Council offices and on the Council's website. In addition, copies were sent for display at all libraries (as well as Poole and Dorchester libraries) and town councils in the district.

### Workshop

5. Delivering more affordable housing through rural exception sites is a priority for the Council. The Council is keen to engage with rural landowners to bring forward sites and so organised a workshop on 24<sup>th</sup> January 2013 inviting rural landowners to come and discuss the Council's policy approach.

### Press

6. The Council issued a press release, which can be viewed in appendix 1. This was picked up by the Dorset Echo, who ran a story on their website on 3<sup>rd</sup> January 2013. The Swanage & Wareham Advertiser included an article in their issue published on 17<sup>th</sup> January 2013. This can be viewed in appendix 2.

### 3. Who was consulted in the preparation of the SPD?

7. The Council consulted the following consultees:

All town/parish councils in the district  
Borough of Poole Council  
Bournemouth & Poole PCT  
British Gas  
British Telecommunications  
Christchurch & East Dorset Partnership  
Civil Aviation Authority  
Corfe Mullen Parish Council  
Crossways Parish Council  
Defence Estates - Durrington  
Defence Estates - South  
Defence Estates (MoD)  
Department for Constitutional Affairs  
Department for Culture, Media & Sport  
Dorset County Council  
Dorset Primary Care Trust  
East Dorset District Council  
East Holme Parish Meeting  
English Heritage (SW Region)  
Environment Agency  
Equal Opportunities Commission  
Health and Safety Executive  
Highways Agency  
Homes and Communities Agency  
Lower Winterborne Parish Council  
Millborne St Andrew Parish Council  
National Grid  
National Grid Property Ltd  
The National Trust  
Natural England  
Network Rail  
NHS Dorset  
North Dorset District Council  
Nuclear Decommissioning Authority  
Owermoigne Parish Council  
Poole Harbour Commissioners  
Puddletown Area Group Parish Council  
Scottish and Southern Energy  
Southern Electricity  
Sport England  
Sturminster Marshall Parish Council  
Synergy Housing Group  
Wessex Water  
West Dorset District Council

8. The Council keeps a Local Plan contacts database, which contains arts', citizens', environmental, heritage, religious, leisure/recreation and residents' groups, as well as wider stakeholders, businesses and individuals. The Council wrote to/emailed 235 of these contacts who have specifically requested to be kept informed of housing-related issues.

## 4. Summary of the main issues raised and how they have been addressed

9. The Council received 16 responses through a mixture of written representations and the Council's affordable housing workshop of 24<sup>th</sup> January 2013. The table below summarises the main issues raised, the Council's response, and actions to amend the document, where necessary. Also included within the table are amendments suggested through internal comments.

### Summary of main issues

Comments	Council response	Actions
No mention of ability to staircase out of shared ownership properties or use the right to buy / right to acquire.	There is merit in clarifying in the second bullet of paragraph 7 that households can staircase out of some properties.	Add the following to the second bullet of paragraph 7: 'There are opportunities in some circumstances for a householder to purchase more equity of a shared ownership property through 'stair casing' (up to 80% in rural exception sites and 100% in all other cases) or use the right to buy / right to acquire. In these cases, public subsidy must be recycled into affordable housing provision.'
It is unclear what 'part 3' means in the last bullet of paragraph 7 and in paragraph 11.	This could be made clearer.	Change 'part 3' in the last bullet of paragraph 7 and in paragraph 11 to say 'section 3 of this document'.
Confusion over whether local means 'district' or 'parish'.	This should be clarified.	Add a definition of local connection to the glossary. Clarify in paragraphs 7 and 45 that local can mean district or parish depending on the circumstances of the development. For example, a rural exception site will be principally for households with a parish connection, whereas affordable housing on allocated settlement extension sites will be offered district-wide.
Confusion over the application of the 0.05ha threshold.	Paragraph 13 should make clearer what the purpose of the 0.05ha threshold is and what is exempted from the policy requirements.	Update paragraph 13 with the following:  '13. Developers of sites of 2 or more net dwellings should provide a proportion of the development as affordable housing. Single dwellings are exempt from the policy. However, the policy does apply to single dwellings on sites over 0.05ha. This aims to ensure the best use of land and prevent abuse of the policy by applicants underutilising land to avoid triggering a requirement for a contribution.  14. For clarification, the requirements of this policy will not apply to:  (a) Mixed use sites <sup>3</sup> exceeding 0.05ha in size, provided that the overall site area occupied by the residential element does not exceed 0.05ha, or does not include a net increase of 2 or more dwellings.

Comments	Council response	Actions
		<p>(b) Single replacement dwellings, even if the existing dwelling and its curtilage exceed 0.05ha.</p> <p>(c) Dwellings knocked down and rebuilt as part of a wider scheme. For example, where 1 dwelling is knocked down and replaced by 2, the policy requirements will only apply to the net gain of 1 dwelling, unless the plot size is over 0.05ha.</p> <p>(d) Any material amendments to extant planning permissions that were not required to comply with the requirements of Policy AH when granted planning permission, provided there is no increase in the permitted number of dwellings. Any new planning approval will be given a time limit for implementation that expires at the same time as the original planning permission.</p> <p>(e) Hotel accommodation, as defined in use class C1 of the Use Classes Order.</p> <p><sup>3</sup> For example, including a commercial element</p>
Suggested ways to redefine housing need.	A planning document is not the place to redefine housing need. Only housing legislation/policy can do this.	No action required.
Reluctance of rural landowners to part with housing stock or use third party management.	<p>Rural landowners can retain a leasehold interest on the land, rather than part with it permanently. The Council must retain nomination rights in order that those with the greatest need receive priority.</p> <p>However, social rented housing does not necessarily need to be owned by local authorities and Registered Providers (RPs). It can be owned by other persons and provided under rental arrangements agreed with the Council or the Homes and Communities Agency. In addition, discounted sales housing does not have to be managed by an RP and nominations will not be carried out by the Council. Instead,</p>	No action required.



Comments	Council response	Actions
	nominations will be assessed as whether or not the household meets the eligibility criteria in the Council's allocations policy.	
Rural landowners should be allowed to use their 'thirds' model.	The Council does not believe that the thirds model would comply with national and local planning policy, which require <i>significant</i> affordable housing in exchange for <i>some</i> market housing.	No action required.
Claims that the Council is being inflexible in terms of not allowing rural landowners more control.	The Council is being as flexible as it can be within the confines of policy.	No action required.
Criticisms over the Three Dragons Toolkit's assumptions.	The Three Dragons Toolkit allows for different figures to be entered where the developer can justify them. The toolkit's default values will be updated annually.	No action required.
Criticism that the Council is relying on one viability toolkit.	The Council is not acting unreasonably in requiring a consistent way to assess proposals. Furthermore, applicants are not restricted to only one toolkit because the Council allows for independent verification in cases of dispute.	No action required.
It would be useful for the Council to publish a list of indicative commuted sums.	Agree that this would be useful, but easier to update if it is published on the website, rather than added to the SPD.	<p>Revise paragraph 17 and add new subsequent paragraphs; delete paragraph 20:</p> <p>17. Any commuted sums should be of 'broadly equivalent value' (NPPF, paragraph 50) to building the equivalent affordable home on the site. The Council has published on its website guidance notes called 'How to calculate the contribution for affordable housing as part of a planning application (April 2013)'. These notes include a list of indicative commuted sums, which the Council calculated taking into account development costs, such as build costs, professional fees, land values, etc. for the most common house types in all of Purbeck's submarkets.</p>

Comments	Council response	Actions
		<p>18. Where an applicant uses the Council's indicative commuted sums to calculate the amount payable, the Council will not challenge the value of the commuted sum if it is in line with the policy requirements.</p> <p>19. The amount of a commuted sum depends on the number of bedrooms in a property. For the avoidance of doubt, the Council will consider rooms that have the potential to be a bedroom (e.g. playrooms and studies) to constitute a bedroom for the purposes of the commuted sum calculation.</p>
Confusion over the formula for calculating commuted sums.	As the Council will rely on these indicative sums, rather than calculate bespoke sums, it is worth deleting the formula in paragraph 19 and the subsequent paragraph.	Delete the formula in paragraph 19 and delete paragraph 20.
Unclear in paragraph 20 why all affordable homes must be provided before 50% of the market homes are completed.	There is no need to remove this requirement, as it is essential to ensure full delivery of affordable homes, whilst allowing developers to provide robust reasons if they cannot comply. However, it could be worded clearer.	Update the end of paragraph 20 with the following: '...Where a developer requires the finances from selling a market home in order to finance an affordable home, a legal agreement will ensure that the market home cannot be occupied until the affordable home is completed to the housing association's satisfaction. This is to avoid situations where developers provide the market element of a scheme and then cease building without any affordable homes being built.'
There is no mention of the timing of commuted sum payments.	Agree that extra wording is required. This would be best as a new paragraph.	<p>Add new paragraph 21:</p> <p>'The Council's starting point is that payment of commuted sums shall be on first occupation of the development. However, the Council will consider the timing of payments of commuted sums case by case, including payment by instalments.'</p>
No mention in paragraph 22 that the Council will charge to process Section 106s.	Agree that paragraph 22 should mention this.	<p>Add to paragraph 22:</p> <p>'A copy of the template is available on the Council's website<sup>4</sup>. To cover the costs of processing S106s, the Council will charge a fee. Details are on the Council's website<sup>5</sup>.'</p> <p><sup>4</sup> <a href="http://www.dorsetforyou.com/406834">http://www.dorsetforyou.com/406834</a></p> <p><sup>5</sup> <a href="http://www.dorsetforyou.com/406834">http://www.dorsetforyou.com/406834</a></p>
Paragraph 24 should better reflect paragraph 8.3.3 of the PLP1 by factoring into negotiations on affordable housing tenure the existing mix of dwellings in a	Agree that this paragraph could be clearer.	<p>Insert into paragraph 25:</p> <p>'...This will be negotiated site by site depending on local needs at the time, the existing mix of dwellings in the locality and viability...'</p>

Comments	Council response	Actions
locality and viability.		
It is not explicit that self builders have to be on the housing register.	Agree that this could be made more explicit.	Add to paragraph 30:  'Households wishing to build a self build affordable home have to be on the Council's housing register.'
Footnotes 12 & 13 of paragraph 34 should not mention the Council's consultants by name.	Whilst the Council uses the three Dragons Toolkit, it no longer uses Three Dragons consultancy firm. To avoid confusion, reference to the consultancy firm should be deleted.	Update footnotes 12 & 13 to delete 'Three Dragons' and replace with 'The Council's consultants'.
The Council should not refuse to register applications that lack viability appraisals. Rather, the Council should register applications and refuse them if required information is not provided during the processing of the application.	On reflection, the SPD is the wrong place to state the Council's validation requirements. Instead, a new paragraph at paragraph 51 should be inserted for clarification.	Insert new paragraph 51:  'All planning applications are subject to the Council's planning application validation requirements, which are published on the Council's website.'
Unclear if the Council is expressing a preference or a requirement for the Three Dragons Toolkit. A monopoly on this toolkit would be unreasonable.	It is not unreasonable for the Council to wish to apply a consistent approach to assessing viability. However, this could be made more explicit in paragraph 52.	Add to paragraph 52:  'To ensure that the Council applies a consistent approach to assessing viability, the Council will assess viability using only the Three Dragons Toolkit.'
The Council should set out more clearly when it will or will not challenge an applicant on affordable housing delivery grounds.	Agree that this would be useful in paragraph 53. As the process is now simplified, there is no longer any need for Figure 1 and this should be deleted.	Update paragraph 53 (and delete Figure 1):  'The Council will not challenge any planning application on affordable housing delivery grounds where it complies with policies AH and AHT by providing whole units of affordable housing and/or a commuted sum in line with the Council's list of indicative commuted sums <sup>22</sup> .'  <sup>22</sup> <a href="http://www.dorsetforyou.com/406834">http://www.dorsetforyou.com/406834</a>
Paragraph 54 should clarify the Council's preferred independent verifier.	Agree that the Council should state that it will refer applications to the District Valuer for independent verification.	Add to paragraph 54:  '...Therefore, where the applicant challenges the Council's affordable housing requirements, the Council will seek independent verification using the District Valuer (DV). The costs for any verification will be borne by the developer. The Council will not seek to challenge the view of the DV.'
Unclear what 'spatial areas' and	Agree that both could be made clearer.	Amend paragraphs 55 & 56 as follows:

Comments	Council response	Actions
‘contributions’ are in paragraphs 55 & 56.		<p>55. ‘Commutated sums will be aggregated and held by the Council. The Council will work with the local community to find projects and will allocate funding accordingly...’</p> <p>56. ‘The PLP1 splits Purbeck into five distinctive spatial areas and aims to deliver a mix of market and affordable housing across each of them. Commuted sums will be spent in the spatial area where they are collected...’</p>
Paragraph 57 should state that commuted sums will be linked to RPI.	Agree that this should be stated.	<p>Add to paragraph 57:</p> <p>‘Commutated sums will be index linked to the Retail Price Index.’</p>
Paragraph 59 should state that the Council will review the Three Dragons Toolkit’s default settings.	Agree that this should be stated.	<p>Add to paragraph 59:</p> <p>‘The Council will review the Three Dragons Toolkit’s default settings annually. This will also include a review of the Council’s list of indicative commuted sums. The Council will produce a monitoring report annually setting out the total amount of contributions collected in each spatial area and how they have been allocated to bringing forward affordable housing schemes.’</p>
Comments that not all needs are being met and the Council should identify more land for housing development.	An SPD cannot allocate land for housing. The Purbeck Local Plan Part 1 partial review will investigate the possibility of doing this.	No action required.
Questions over the definition of perpetuity.	A Section 106 may vary depending on circumstances. Therefore, to avoid confusion, the definition of perpetuity will be removed from the glossary.	Delete perpetuity from the glossary.
Ensure that after first use of the words ‘Section 106’, this is abbreviated to ‘S106’.	Agree that this should be applied consistently.	After first reference to ‘Section 106’, change all future references to ‘S106’.
<p><b>Support</b> noted for the following: lower level of affordable housing in the north of the District; provision of a Section 106 template; self build homes; the Council’s approach to not prescribing ratios for market/affordable housing on exception sites; explanation of the viability assessment process; ensuring all affordable homes are completed before 50% of market homes are occupied; transfer of affordable homes to a housing association, where they will remain affordable in perpetuity; discounted sales housing; increasing supply to satisfy local needs; and use of affordable rent.</p>		

# News release

## Important planning guidance out for consultation

**People in Purbeck can have their say on some important planning documents in the New Year.**

The guidance documents will set out Purbeck District Council's approach to housing needs, providing information about planning policies and setting out how the public can get involved in decision-making.

The consultation, which runs from 3 January to 14 February 2013, will give people the opportunity to comment on the following documents:

- **Housing Strategy** - a core document setting out the council's approach to meeting housing needs. It integrates housing and planning policy issues and identifies what the council is going to do to tackle them.
- **Affordable Housing Supplementary Planning Document (SPD)** - providing the information necessary to implement the planning objectives of the Housing Strategy and the council's affordable housing policies. It also sets out how the council is being proactive to enable more affordable homes, for example by incentivising landowners to bring forward land and promoting self-build affordable housing.
- **Updated Planning Application Validation List** - meaning developers will have to provide more information up-front with their planning application.
- **Revised Statement of Community Involvement** - setting out how the council involves the public in planning decisions and policy making.

Councillor Gary Suttle, Leader of the Council, said:

'Meeting the housing needs of local people is a priority for this Council. The Housing Strategy and Affordable Housing SPD are key in making this a reality. They set out how we are going to provide the housing the local community needs and detail the innovative ways that we support to deliver affordable housing.'

'The update to the Planning Application Validation List will make it clear to developers what we expect of them and the revised Statement of Community Involvement sets out how the public can get involved in planning decisions and policy making.'

'Purbeck District Council hopes that these important documents will lead to positive changes in Purbeck. We welcome the views of the public on the consultation documents.'

The documents can be viewed online at [http://www.dorsetforyou.com/purbeck\\_consultation](http://www.dorsetforyou.com/purbeck_consultation) or at Purbeck's libraries, town council offices and the council offices at Westport House, Worgret Road, Wareham.

Press article

Swanage & Wareham Advertiser 17<sup>th</sup> January 2013

series exploring the impact railways had on world economies and societies.

Three weekly one hour programmes entitled, 'Locomotion - Dan Snow's History of Railways', have been recorded.

Historian and presenter Dan Snow spent a wet summer's day filming on the restored Purbeck line in July, last year. He enjoyed a footplate ride on a 1990s steam engine between Swanage, Harman's Cross, Corfe Castle and Norden.

NEW DOCUMENTARY SERIES EXPLORES HOW

Volunteer steam engine driver Tony Hallworth, who worked with the production crew on the day, said: "I was interested to meet Dan Snow and learn more about this new documentary series because the Bodmin and Wenford line, on which I used to work for British Railways as a steam locomotive fireman in the early 1980s, was one of the first railways to be built in the country."

The BBC2 series explores how

into a transport network drove forward the industrial revolution.

Swanage Railway Trust chairman Liz Sellen is sure that Dan's footage of our largest steam loco is a real thrill and the highlight of his visit to our restored railway through the Isle of Purbeck.

"Dan and his colleagues were a delight to work with and everyone on the Swanage Railway is

## Residents having say on planning

PURBECK residents can have their say on a range of planning documents, under a consultation running until February 14.

Officials want people to comment on Purbeck District Council's housing strategy, affordable housing, updated planning application list and community involvement statement documents. Cllr Mike Lovell said: "Meeting the needs of local people is a priority for this council and the housing strategy and affordable housing supplementary planning document are key to making this a reality. They set out how we are going to provide the housing the local community needs. They also explain the innovative ways we support to deliver affordable housing."

The documents can be viewed online at [dorsetforyou.com](http://dorsetforyou.com) or at Purbeck District Council's Wareham headquarters or local libraries.

*FW ADVERTISER 17/01/13*

## CHOCOCO

THE PURBECK CHOCOLATE CO.

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\* Offer valid on name, full size hot drinks until Jan 31st on presentation of this voucher.