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Mr Gavin Barwell MP
House of Commons
London
SW1A 1AA

Please ask for: Stephen Thorne
Monday 24th Oct 2016
Our Ref: SPFNPPF

Dear Mr Barwell

Proposed changes to national planning policy

I write on behalf of the Dorset Strategic Planning Forum (SPF) to express their concern over some of the proposed changes to the planning system currently being considered by Government.

By way of background the Dorset Strategic Planning Forum is made up of elected representatives from all nine Dorset local authorities. The SPF was formed to guide strategic planning decisions across Dorset, to comply with the statutory duty to cooperate and to work with the Local Enterprise Partnership and Local Nature Partnership in the overall development strategy for the County and inform and align spatial and investment priorities. All nine Dorset local authorities are committed to promoting development which meets all our needs as identified through the evidence base and as tested through development plan policies.

The Dorset local authorities are seeking to balance varying opportunities and constraints in planning for sustainable development. Constraints to development vary across the area, and include Areas of Outstanding Natural Beauty, Green Belt, and internationally protected wildlife sites. The local authorities face a difficult challenge in seeking to support housing and economic growth whilst protecting and enhancing Dorset's outstanding natural environment.

The SPF supports the overall Government objectives to deliver more housing to help stimulate sustainable growth across Dorset and recognises the important role the planning system has in achieving this. However, the SPF considers that some of the proposed changes go too far in the pursuit of market housing over other aspects of sustainable growth. Accordingly, the SPF urges the Government to re-consider some of the proposed changes to the planning system as explained in this letter.

Affordable Housing including Starter Homes

The delivery of affordable housing in Dorset is a key strategic priority to meet both a considerable unmet existing need but also to support the local economy and retention of key employers and required workforce.

The SPF therefore has concerns with the proposed changes to affordable housing policy including the statutory obligation to provide starter homes for development of 10+ units. The delivery of affordable housing has already been compromised by the recent re-introduction of the threshold on small sites of 10 or less (which make up a significant

part of local housing delivery) where affordable housing and other contributions should no longer be sought.

To now require all major development to provide up to 20% of units as starter homes has potential to further significantly impact on Dorset's ability to plan for 'balanced sustainable communities' as social rent / shared ownership affordable models are likely to be 'squeezed out' due to being less viable over and above meeting the statutory requirement for starter homes.

There is also the wider issue of the starter homes only being 'affordable once' from the initial purchase. The proposed £250,000 cap is also already unaffordable to many local residents and therefore simply boosting the supply of starter homes is unlikely to fundamentally address the sustained affordability issues across Dorset.

We would also urge Government to consider further the implications of starter homes being exempt from CIL and most other Section 106 tariffs on infrastructure delivery required to support new development. Without sufficient infrastructure provided to support all forms of development there will likely be issues with delivering the required new homes in a sustainable way (whether they are starter or other types) and reduction in infrastructure funding needs to be considered together before this aspect of the proposals is introduced.

Overall, further consideration is required as to the long term implications on affordability of the starter homes policy. The SPF consider that the provision of starter homes should be limited in some way or at least not at the direct expense of other affordable products being secured through the planning system.

Self-build and custom housebuilding

The SPF supports delivering a diverse, flexible and wide ranging housing market and acknowledges the role self-build and custom housebuilding can have as part of this. However, the SPF is concerned with the unintended circumstances that the new statutory requirement to plan for self-build and custom housebuilding needs could have.

For example, there are questions over the authenticity of all the people who apply to be put on to Council's self / custom register and whether they genuinely are seeking serviced plots. Caution should therefore be applied to the register rather than it being used as evidence of need that the LPA's planning provisions are then required to meet. There is a danger that meeting self / custom build needs in this way could be prioritised over using the land for other forms of housing / development that are in greater need.

The SPF is also concerned with the relationship between the self / custom build industry and the related CIL exemption. Tighter controls over what can constitute a genuine self / custom CIL exemption are needed to avoid the current approach that is open to misuse and can almost apply to any housing development. To overcome this, the SPF suggest that CIL exemption for self / build should only be granted on serviced self / custom build plots that have been identified and brought through the planning system to meet the needs quantified on the related register.

Permission in Principle and Brownfield Registers

The SPF endorses the principle of using brownfield land to provide more housing through introduction of Permissions in Principle and Brownfield Registers. However, the SPF is concerned over potential impacts on local planning authorities' resources arising from these new provisions as the onus on assessing the detailed site suitability for development appears to be shifting from the developer / land owner to the LPA. The SPF request that in order for PIP and the Brownfield Register to be truly effective in boosting housing delivery LPA departments must be properly resourced by Government to deal with the additional workloads these new provisions will create.

The SPF is also concerned with the implications of PIP being automatically given to allocations in local plans for a period of 5 years. Imposing these time limits on allocations does not take into account the strategic nature of local plans that plan for 15+ year horizon where land is often identified to be phased and come forward later in the plan period. The SPF consider that in order to plan an area strategically, Government should instead consider a provision where LPAs set out which allocations that have PIPs for the first five years and those that come into force at a later date (or are given say 10 years from the adoption of the plan). This will avoid having to update the Local Plan by default every five years simply to refresh or reinstate PIPs over the lifetime of a plan.

In addition, it is important for the new policy tools on brownfield land to be considered alongside the aims of achieving self sustaining and balanced communities. For example, we would want to see sufficient assurances that any new policy on brownfield land to boost housing supply does not result in the pressure for meeting housing needs actively encouraging existing community, employment and other supporting facilities to be redeveloped for housing.

Proposed 3 year time limit on employment Land before being considered for housing

Dorset is committed to sustainable economic growth and through the LEP is delivering a series of projects to increase the supply of employment land and delivery of jobs within the County. In this context, the SPF is very concerned over the proposed 3 year time limit on employment land being developed before it can then be considered for housing. The proposed approach will have significant implications on Dorset's ability to plan strategically for meeting employment needs over timeframes beyond 3 years.

As it stands it is likely that employment land will simply be held back in the knowledge that a residential land value (which far outstrips other use values in Dorset) can be achieved after 3 years. In this context, we would advise against imposing a time limit on employment land coming forward before being considered for alternative uses.

As an alternative, the SPF would favour any policy revisions that seek to allow the release of employment land to housing being focused more on evidence of employment needs, demand and supply rather than an arbitrary time period. For example, introducing a requirement for local planning authorities to update evidence on an annual basis on employment supply, demand and need could assist the process of identifying land that must be retained or could potentially be released for other uses.

Housing Delivery Test

The SPF is concerned about the proposed new 'Housing Delivery Test', with the government potentially intervening where local plan housing targets not being delivered. LPAs are striving to ensure a 5-year supply of housing sites, successfully through local plan allocations and granting windfall consents. However, it is not in a LPAs power to require a developer to actually build out consented schemes. The SPF considers that the answer to the under delivery of housing will not be resolved by requiring an LPA to identify additional sites through a local plan review that may well be unsustainable. It is essential that the development industry plays their part in delivering consented schemes and the government should consider measures to encourage this, without such measures it is unlikely that purely identifying additional sites through a local plan review will result in an increase in supply.

Summary

The SPF is supportive of Government changes that will help to deliver sustainable growth across Dorset. However, as outlined in this response the SPF has a series of concerns over some of the proposed changes to the planning system, which in the opinion of the SPF are too focused on delivery of market related housing over other forms of sustainable development.

Overall, the SPF consider that it is imperative that any revised national policy, and detailed regulations, whilst achieving a much needed boost in housing supply, are balanced with meeting the needs of all forms of development that together can deliver sustainable growth and communities.

The SPF would welcome a meeting with you in the near future to discuss the points raised in this letter in more detail and look forward to hearing the Government's response.

Yours sincerely



Stephen Thorne
Head of Planning and Regeneration Services incl. Building Consultancy
Borough of Poole



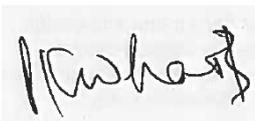
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Portfolio Holder for Planning and Regeneration
Borough of Poole



Councillor Margaret Phipps
Portfolio Holder for Managing Our Environment
Christchurch Borough Council



Councillor Steve Butler
Portfolio Holder for Planning
East Dorset District Council



Councillor Peter Wharf
Chair of Planning Committee and Purbeck Local Plan Partial Review Advisory Group
Purbeck District Council



Councillor David Walsh
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North Dorset District Council



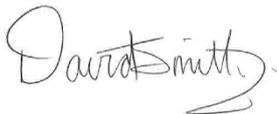
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West Dorset District Council



Councillor Peter Finney
Cabinet Member for Environment, Infrastructure and Highways
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