



Planning & Community Services  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

Date: 13 December 2013

Our Ref: FT M5/0109-17

Your Ref:

By email only:  
[localplan@purbeck-dc.gov.uk](mailto:localplan@purbeck-dc.gov.uk)

Dear Sir or Madam

**RE: PURBECK CIL – ADDITIONAL VIABILITY EVIDENCE, DECEMBER 2013**

We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Further Testing

We welcome the testing of identified sites within the District, as highlighted in our previous representations. We are also supportive of the range of sites chosen to test.

Purbeck's 3D Toolkit

We support the Council's 3D Toolkit as a method of opening up the viability process to developers and interested persons. We would propose that the Council considers utilising this toolkit within future development negotiations into s106 payments, with developers providing evidence for cost inputs and the Council auditing these responses accordingly. This would reduce the reliance on full viability assessments except in the most appropriate cases.

Purbeck Local Plan Policy D

Appreciating that the development costs associated with these local plan requirements are unknown, when individual site negotiations take place, given the evident housing need within Purbeck, retention of affordable housing at the policy requirement should take precedence over higher design standards.

Purbeck Local Plan Policy PH

Page 8 of the Additional Viability Tests indicates that this requirement will be met either through alternate land arrangements with the developer, waiving of the policy requirement or CIL. Evidently, these are incompatible within the statutory framework which seeks to ensure that there is no 'double charging'; thus it would not be possible for some sites to provide measures as part of their planning obligations whilst others provide sums as part of a CIL charge. Depending upon the nature of the measures desired under this policy, it would be questionable whether they would be considered 'infrastructure' for the purposes of CIL.

Site Testing

It is recognised that a considerable number of the sites indicate that the Council's chosen CIL levels strike the appropriate balance to ensure delivery of housing is not compromised.

We note concern in respect to the testing of sites 1, 3, 9 and 11 which all indicate that *“it is likely the Council would have to re-negotiate the affordable housing provision to ensure site viability”*, with the Council echoing that this approach will be necessary for the majority of re-development sites.

Firstly, we refer to our above comments, that in such instances, negotiation of other site specifics and the consideration of alternate tenure and type to be provided, should be considered before reducing the affordable housing provision.

We appreciate the Council's viewpoint that these types of development only contribute to 3.9% of the current 5 year housing land supply; roughly 27 dwellings. Should the Council seek to proceed on this basis, the annual housing review should specifically consider the delivery of sites within this bracket, and monitor the proportion of units delivered and the affordable housing provision resulting from them. Should this type of development increase as a proportion of the local authority's housing delivery, it has the potential to undermine the deliverability of affordable housing across the District.

In summary, based upon the viability evidence, the Council has chosen a CIL rate which seemingly strikes an appropriate balance, with the exception of the re-development sites. To ensure this does not result in the failure to deliver the affordable housing targets, the Council should make it clear that before considering a reduction in the affordable housing provision; other alternate designs, tenure, mix and type will be considered first. It will be necessary to effectively monitor affordable housing delivery, and the Council should identify a mechanism within their CIL Charging Schedule to trigger a review should affordable housing delivery be compromised.

We request that the **South West HARP Planning Consortium** is retained on the Council's consultation database with **Tetlow King Planning** listed as their agents.

Yours sincerely

Signature  
hidden

**Felicity Tozer MA**  
For and On Behalf Of  
TETLOW KING PLANNING

cc: Aster Group  
Guinness Partnership  
Raglan Housing Association  
Sanctuary Housing Group  
Spectrum Housing Group

Fiona Brown, Purbeck District Council