

**CORE STRATEGY
DEVELOPMENT PLAN
DOCUMENT (DPD)**

LDF EXAMINATION

Matter 7c– Affordable Housing

STATEMENT PREPARED BY:

**WOOLF BOND
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REPRESENTATION NUMBER: 507541

On behalf of:

**Bodorgan Properties (Channel Islands)
Ltd., Sainsbury's Supermarkets Ltd. &
Taylor Wimpey Strategic Land**

AUGUST 2013

1. Our joint clients own and have interests in the proposed mixed use extension at North Christchurch (CN1) and wish to ensure that the planning policy framework aimed at securing release of the land is sound in that it is positively prepared, justified, effective and consistent with national policy. To do so it must be sufficiently flexible.
2. Our comments relate only to the delivery of policy CN1 (Christchurch Urban Extension). We comment only on Questions below as related to the delivery of policy CN1.

Question 1: Are the percentage requirements for affordable housing set out in LN3 justified by viability evidence?

3. No comment.

Question 2: Should the percentages reflect property market areas rather than a greenfield/brownfield differential?

4. No comment.

Question 3: Are viability testing assumptions realistic with regard to:

- ***Residual land values***
- ***Density***
- ***Other costs such as SANG/CIL/mitigations/space standards?***

5. Residual land values are to a degree a reflection of the density proposed for any site. It is considered by the developers regarding CN1 that the density is realistic as to the delivery of a scheme for 950 dwellings on the site.
6. Turning then to the issue of other costs such as SANG this is a potentially expensive problem to solve which may impact adversely on the delivery of the site in cost terms. The problem is amplified with the Council's approach to CIL which includes the funding of SANG mitigation schemes, especially given as proposed by the Council a SANG requirement is placed upon the site at the application stage. The reason as noted elsewhere in these requirements is that MEM have already agreed a scheme for SANG for the Roeshot Hill site with

Natural England, so there would be the prospect of double charging with CIL in place.

Question 4: Will the low trigger for providing AH prevent development from coming forward?

7. The likely impact of the trigger is to reduce the viability of urban sites, a problem already encountered during the recession where no affordable housing has been provided in CBC over the past 3 years. We have noted in our response to Matter 1 that there is a need for release of sites such as Roeshot Hill which can deliver a significant amount of affordable housing.

Question 5: Does recent viability testing for CIL indicate any changes to policy are needed?

8. No comment.

Question 6: The implementation of both Policy LN3 and LN4 (Affordable Housing and exception sites) relies on the Affordable Housing SPD. Is this SPD intended to be adopted concurrently with the CS?

9. No comment, although we have submitted separate representations upon this SPD.