

A. Gypsy and Traveller Accommodation

1. Does the Core Strategy set out a clear strategy for the allocation of Gypsy and Traveller sites?

In responding to the Pre-submission Core Strategy we supported the guidelines in the policy providing they were followed both in practice and spirit.

At the time we were not fully aware of the procedure involved in site allocation. We now know that Dorset County Council in their Dorset Wide Gypsy, Traveller and Showpeople Consultation have put forward various sites, they will put in a planning application when the consultation is completed, East Dorset District have to approve planning permission for any in their District.

CPRE is aware of one proposed site in East Dorset for a very large transit site, and this makes us aware that possibly the Core Strategy policy is not sufficiently balanced to meet the needs for both communities.

Planning Policy for Traveller Sites, March 2012. Paragraph 9, point d: this is relating the size of the camp to the local community.

The Core Strategy, Policy LN5, point 4. This needs to be amended to the following:
Sites should not overwhelm the local community and should not have an unacceptable impact on the amenities of the wider community.

2. The above representation also answers this point concerning LN5 and national planning guidance.

B. Housing Space Standards

1. Are minimum space standards justified (LN1)

We can find no guidelines in the NPPF on minimum space standards. Chapter 7 is dedicated to overall design, mainly on the larger scale. Chapter 8 is concerned with promoting healthy communities. The only reference at all is in the title of Chapter 6 which refers to high quality homes. However, the NPPF offers guidelines on a larger canvas than individual homes and families.

CPRE fully supports our CS in setting guidelines to provide people with a home that has sufficient space to match their needs. When there is too little space it causes stressful behaviour, there is no room to store basic household items and no room in which to seek a little quietness.

This makes a home very cluttered, over crowded, no room for children to do their homework, no room for a quiet moment. This is not conducive to good health.

C. Affordable Housing

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

CPRE fully supports East Dorset in their desire to re-balance an unbalanced housing supply by demanding a high percentage of affordable housing as well as a suitable mix of market housing. See 2.3 of the Draft Housing and Affordable Housing SPD.

Chapter 8 of the SPD looks at viability. The planners show an awareness of the need for the developer and landowner to enjoy a suitable profit, (para 8.3). Research into a suitable CIL level has also been undertaken.

One concern is that the Local Authorities may not have the sufficient skills to judge the viability assessments. They will have to be trained to the same standards as the developer's negotiators.

CPRE will accept that some sites, especially smaller brownfield sites that are difficult to develop, may not contribute up to 40% affordable housing. However, we are an organisation committed to protecting the countryside, and generally against all building on the Green belt. We must protect as much as possible from development. We recognise that East Dorset is a special case as there are no large old industrial sites, or any land other than Green Belt for delivering the numbers of housing required.

C 1. cont:

CPRE feels that the wording 'up to' should be replaced by 'between' on any large brownfield sites that come forward and definitely on green field sites.

On Brownfield it should be 'between 30% to 40%' affordable housing.

On Green Belt it should be 'between 40% to 50%' affordable housing.

We appreciate the planners will be put under a lot of pressure by the DCLG's Section 106 Affordable Housing Requirements April 2013, where developers can appeal to the Secretary of State if they do not agree with the S106 demand. The Local Authorities must acquire a high level of skill and understanding of viability so they can be successful negotiators. They have to try to redress the unsustainable housing market or East Dorset's youth will have to live elsewhere and our population will just get older and more expensive to support.

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

No.

The Housing Strategy for Christchurch and East Dorset (2013 to 2016) describes our housing characteristics as having been developed due to our peripheral location to the Poole/Bournemouth conurbation. It grew partly as dormitory settlements, also attracting better off in-migrants and retirees.

Over time this has led to a predominance of larger executive type housing with few areas of smaller and more affordable market homes. The strategy describes the bulk of East Dorset's housing as a 'dysfunctional housing market dominated by high value homes'. This trend is continuing with the 'up and over' of so many of what were smaller and cheaper bungalows which are now large and desirable residences.

Many of these settlements are completely unsustainable, requiring private transport to reach any facilities, they are purely large residential areas. ***The criteria for location should be its sustainability, especially in access to facilities and also in creating sustainable and inclusive communities, not reflecting property market areas.***

3. Are the viability testing assumptions realistic?

We think the Draft Housing and Affordable Housing SPD is sound on these points. The Local Authorities must stand firm and protect East Dorset's future sustainability.

4. Will the low trigger for providing Affordable Housing prevent development from coming forward?

C 4. cont:

The Plan recognises the need for competitive returns to both landowner and developer. It also recognises the housing needs of the East Dorset District. The plan has to work for the sustainable future of our area.

In answering question C/1 we voiced our concerns over the trigger for affordable housing not being low enough. However, the Draft Housing and Affordable Housing SPD, Paragraph 4.8, says to ensure flexibility there is no minimum affordable housing percentage required. We can accept this on sites that are very small and difficult to develop, but not on larger sites. On easy to develop sites there should be a set lower limit rather than 'up to'.

Having spoken to a developer who kept assuring me that a site would generate 'up to' 50% affordables, when pinned down admitted to 30%. This is not good enough, there must be a lower figure. We must have a mix of young people in our settlements if East Dorset is to develop a vibrant economic sustainability.

I know we are not supposed to quote from documents, but the following is from the Draft Housing and Affordable Housing SPD, Paragraph 2.3: 'Major concerns have arisen for age related services and long-term economics, as the older population concentrates still further and the available work-force shrinks over the next twenty years.'

The policy must not fail. We must have more affordable housing without having to build over all our countryside.

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

The consultation document indicates it is. 1.1 of the SPD states that this forms part of the Christchurch and East Dorset Local Plan. The timetable (App 1) of the East Dorset Local Development Scheme 2013, shows both the SPD and CS due to be adopted/approved in December 2013. However, there does seem to have been a little slippage in the dates. The SPD is currently out for Consultation with a closing date of 6th September.