



## **Christchurch and East Dorset Housing and Affordable Housing Supplementary Planning Document**

### **Consultation Statement**

The Housing and Affordable Housing Supplementary Planning Document (SPD) forms part of the Christchurch and East Dorset Local Plan. It has been produced to expand upon housing and affordable housing policies set out in the Local Plan Part 1 - Core Strategy.

The consultation period for this document ran from 16<sup>th</sup> July – 3<sup>rd</sup> September 2018.

As part of the production of this SPD a number of people were consulted including;

- Local Residents
- Interest Groups
- Local Estate Owners
- National Land Holdings
- Neighbouring Authorities
- Town and Parish Councils
- Planning Consultants
- Government Departments
- Other Businesses
- Other Public Sector Organisations
- Internal Local Authority Contacts
- Others who had requested to be kept informed

The issues raised by those who were consulted with are set out in the table below along with how those issues have been addressed.

RESPONDANT	PARA	SUMMARY OF COMMENTS	LPA RESPONSE
<b>Alderholt Parish Council (Maria Humby, Parish Clerk)</b>		The old SPD refers to Core Strategy Policy LN6 regarding housing and accommodation for vulnerable people, but the draft SPD quotes the same Core Strategy policies as being LN7.	This reference is an error, and will be corrected to refer to Policy LN6.
<b>Wiltshire Council (Ray Bryant, Spatial Planning Team)</b>	n/a	No comments to make.	Noted
<b>South West HARP Planning Consortium (Annie Gingell, Assistant Planner, Tetlow King Planning)</b>	General	<p>The revised SPD fails to take account of the changes to the definition of affordable housing set out in the revised NPPF.</p> <p>The need for affordable housing across Christchurch and East Dorset should be reassessed in the light of the NPPF, as this will change the types of households whose needs will now be considered as requiring a form of affordable housing. This may require an update to the Strategic Housing Market Assessment and discussion with housing associations to ensure that the practical implications of the new tenures are fully considered.</p> <p>There is no comment on the new emerging local plan policies in the SPD. The relationship between new and emerging policies should be addressed.</p>	<p>This is acknowledged and references to the NPPF and specifically the definition of affordable housing will be updated.</p> <p>This will be undertaken as part of work on the emerging Christchurch and East Dorset Local Plan Reviews. An update to the SHMA is in progress and is expected to be completed at the end of 2018. Where changes to policy are required, these will be developed in the Local Plan Reviews.</p> <p>The updated SPD still relates to the existing Core Strategy policy. It is acknowledged however that this could be expressed more clearly in the document and further text will</p>

be added to the introductory section to clarify this position.

**Rentplus UK Limited**  
**(Megan Rossiter, Principal Planner,**  
**Tetlow King Planning)**

General

The revised SPD is not sufficiently up to date to respond to the revised NPPF. This contains new policies and guidance relating to the assessment of housing needs and more specifically the tenures of affordable housing that local planning authorities must assess and seek to deliver to meet local housing needs. The Councils must update their evidence bases to fully understand which of those tenures and how many of each will be required to meet the diverse local housing needs across Christchurch and East Dorset.

Rent to buy affordable housing seeks to meet the needs of those households who cannot access home ownership without assistance. Some of the housing needs evident in each of the local authority areas can be better met by rent to buy which has now been incorporated within the definition of affordable housing in the revised NPPF.

Sections 4, 5 and 7 of the draft

It is acknowledged that the SPD should be updated in respect of the published NPPF and references to the NPPF and specifically the definition of affordable housing will be updated.

Assessment of future housing need, including for specific types and tenures of affordable housing will be undertaken as part of work on the emerging Christchurch and East Dorset Local Plan Reviews. An update to the SHMA is in progress and is expected to be completed at the end of 2018. Where changes to policy are required, these will be developed in the Local Plan Reviews.

revised SPD will need wholesale review to be brought up to date with the new definitions of affordable housing, ensuring that the adopted local policies can be implemented to meet all affordable housing needs and not just those specified in the 2012 Framework. For example, paragraph 4.19 may be more usefully worded:

“To facilitate mixed tenure communities that address different socio-economic housing needs, developments will be sought that incorporate affordable housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) (as defined in the NPPF). The Council will consider the most appropriate mix with reference to local affordability and site specific circumstances.

The SPD guidance on legal agreements will also need to be amended to reflect the specific provisions set out in the individual definitions of affordable housing types within Annex 2 of the revised Framework, as these are very clear

		<p>as to which tenures will be required to be retained in perpetuity or have subsidy recycled. This includes paragraphs 4.23 to 4.27, which may also need to be amended to respond to the need for and practical implications for individual developers on the use of nomination agreements.</p> <p>Appendix 2 of the SPD will also need updating to contain the new definitions.</p> <p>The review of Existing Use Values undertaken by Tony Williams at District Valuer Services is now out of date and will need to be reviewed. We request that Rentplus is also invited to participate in future assessments of housing need and viability alongside locally active housing associations and other developers to ensure that the most up-to-date information is used to inform the assessment.</p>	
<p><b>East Dorset Environment Theme Action Group – Hilary Chittenden</b></p>	<p>Various</p>	<p>Various typos noted: 1.5 – Councils’ 1.8 – practice 2.2 – mid-1960s 4.5 – development which housing is 4.8 – AONBs</p>	<p>These are noted and will be corrected.</p>

		4.25 – households 8.2 – At policy-making level, 8.8 – Councils’	
<b>Steve Gerry</b>	4.9	<p>The targets for affordable housing seem reasonable but I am concerned that in reality these will be watered down and developers will concentrate on building high-price housing. We don’t have enough high-density housing in the area for younger people at affordable rents or prices. There is also a NIMBY attitude that resists any housing and also resisting having people with lower incomes and families in general as neighbours.</p> <p>Future targets must not be so easily evaded by developers.</p> <p>It must be made clear that local residents who are parents want to see sensitive affordable new housing for young families. Given the failures of the mortgage market and high deposits required, most people need housing association rented properties rather than shared ownership which could leave people with negative equity.</p>	<p>The comments are noted. It remains Council Local Plan policy to seek the majority of affordable housing as affordable rented, albeit that other forms of tenure, including low cost market rent, also now fall within the definition of affordable housing.</p>