



FAO David Hogger
c/o Jenny Neale
The Programme Officer
Purbeck District Council
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Date: 18 June 2012
Our Ref: JAS M5/0109-10
Your Ref:

By e-mail and post:
JennyNeale@purbeck-dc.gov.uk

Dear Sir / Madam

RE: PLANNING PURBECK'S FUTURE: CONSULTATION ON THE NATIONAL PLANNING POLICY FRAMEWORK AND THE PLANNING POLICY FOR TRAVELLER SITES

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 concern is to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Our comments on the Council's statement on the implications of the publication of the NPPF/Main and Additional Modifications are as follows:

Main Modification 9

The Council have increased the plan period to cover up to 2027. From the date of adoption (probably some time at the beginning of 2013) this will cover only 14 years. The Council need to plan for 15 years to be in accordance with the NPPF paragraph 157.

Main Modification 29

We support the Council in allowing market housing to make a contribution to rural exception schemes to make them viable. However, we consider that a fully formed policy for development management purposes needs to be inserted here. The matter is not straightforward and the policy wording here too vague to be considered either effective or positively prepared as per the tests of soundness in the NPPF. We do not consider that setting out further detail in the Council's Housing Strategy is appropriate as this does not form part of the development plan. We recommend that the proposed amendment is removed at the end of the policy and replaced with:

'A proportion of market housing will be appropriate only where it can be demonstrated that the market housing is essential to cross-subsidise the affordable housing and that the site would be unviable without this cross-subsidy.'

The supporting text can then set out how the assessment of viability will work.

Additional Modification 131

This modification includes a trajectory for new housing in the District over the plan period. This is required by NPPF paragraph 47. This states that:

'To boost significantly the supply of housing, local planning authorities should...for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.'

However, the additional modification does not include a trajectory for the delivery of affordable housing. This housing implementation strategy could be provided as part of the Housing Strategy, but this should be clearly stated within the document. The trajectory, or reference to it, should be included to ensure the document is sound.

The above comments are intended to be constructive. We would like to be informed of the progress of the Core Strategy examination; please ensure that the **South West HARP Planning Consortium** are retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours faithfully

JAMIE SULLIVAN MRTPI
For and On Behalf Of
TETLOW KING PLANNING

cc: Knightstone Housing Association
Spectrum Housing Group

Fiona Brown

Raglan Housing Association
Synergy Housing Group