



Planning Policy
East Dorset District Council
Furzehill
Wimbourne
Dorset
BH21 4HN

Date: 20 February 2015
Our Ref: EB/LH M5/0103-13
M4/0514-15
Your Ref:

By email only:

planningpolicy@christchurchandeastdorset.gov.uk

Dear Sir or Madam

RE: COMMUNITY INFRASTRUCTURE LEVY – DRAFT CHARGING SCHEDULE, FURTHER MODIFICATIONS, JANUARY 2015

We represent the **South West HARP Planning Consortium** which includes all of the leading Housing Association Registered Providers in 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.

A member of the Consortium, Spectrum Housing Group, has raised a particular concern in relation to a strategic site, allocated in the adopted Core Strategy, which is currently progressing through planning. Thus appended to this representation, is a statement on the viability of this strategic site under the currently proposed CIL rate. The concerns raised have been discussed with the Council, and I will be attending the CIL Examination to discuss further.

PPG Changes

Whilst we are encouraged that the Council will be seeking to confirm the use of the lower affordable threshold requiring commuted sums in designated rural areas and the AONB, as detailed in the Councils recently published Practice Note, we are concerned that the Councils are waiting for the progression of their Site Allocations DPD to bring this forward. The PPG does not indicate that the imposition of the lower threshold must be adopted through a Local Plan, but states that a local authority may choose to apply the lower threshold.

It has been generally accepted that local authorities can adopt the threshold through resolution by the Full Council. This is detailed in a recent Planning Advisory Service summary - http://www.pas.gov.uk/web/pas1/s106/-/journal_content/56/332612/6783401/ARTICLE#9.

We would encourage the Council to adopt the lower threshold, requiring commuted sums, immediately.

Viability: Commuted Sums and CIL

Adopting CIL at a higher rate for proposals between 5-9 units would preclude the use of the lower threshold, unless a CIL review was undertaken.

Table 4-1, CD07, illustrates the significant viability difference between schemes of 5-9 units with and without the provision of affordable housing. It clearly demonstrates that against the currently proposed CIL rate of £150/sqm (FM5 and FM6), the viability margin with the imposition of affordable housing is small.

We would recommend that the Councils reconsider the CIL rate on these sites, to ensure that the ambition to introduce the commuted sum threshold is not compromised.

The above comments are intended to be constructive. Please ensure that the **South West HARP Planning Consortium** are retained on the Local Plan database, with **Tetlow King Planning** listed as their agents.

As noted above, we will be attending the Examination on behalf of Spectrum Housing Group.

Yours faithfully



ELIZABETH BOYD
ASSOCIATE DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

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

Katherine Blatchford, Christchurch Borough Council
Shelley Hayes, Christchurch Borough Council
Tim Davis, Christchurch and East Dorset Partnership
Keith Mallett, East Dorset District Council

Enc: St. Leonard's Hospital Statement, on behalf of Spectrum Housing Association