

Core Strategy

12 Meeting Local Needs Background Paper

Pre-Submission Consultation
2nd April – 25th June 2012



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East Dorset District Council

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1 Introduction

1.1 This background paper is one of a number of papers produced as part of the Christchurch and East Dorset Local Development Framework to inform the Pre-Submission Core Strategy. This particular paper sets out the refinement of policy options for the Core Strategy Meeting Local Needs chapter following consultation undertaken between October 2010 – Jan 2011 on the Core Strategy 'Options for Consideration' document. Specifically, the Meeting Local Needs chapter sets out policy options associated with Meeting Local Needs.

1.2 Preparation of the Pre-Submission Core Strategy Meeting Local Needs chapter has involved consideration of the following:

- National and local policy;
- Core Strategy 'Options for Consideration' consultation and ongoing engagement;
- Sustainability Appraisal, Habitats Regulations Assessment, Health Impact Assessment and Equalities Impact Assessment;
- The Local Development Framework Evidence Base;
- Infrastructure delivery and viability.

1.3 This background paper also identifies, where appropriate, strategic infrastructure requirements to support the policy options within the Meeting Local Needs chapter which feeds into the wider Core Strategy infrastructure delivery plan and preparation of the Community Infrastructure Levy Charging Schedule.

1.4 This paper should be read in conjunction with the following key issue papers prepared in refining Core Strategy options from initial issues and options consultation undertaken in March 2008 to the 'Options for Consideration' consultation undertaken from October 2010 – January 2011.

- **Key Issue Paper 13: Delivering Suitable and Sufficient New Housing**
- **Key Issue Paper 14: Community Issues**
- **Key Issue Paper 17: Affordable Housing**

2 Formation of Pre Submission Options

2.1 This section provides a critical assessment of the options put forward for consultation in the Meeting Local Needs chapter of the 'Options for Consideration' Core Strategy and provides recommendations for the policy approach to be adopted in the Pre-Submission Core Strategy. The assessment process examines the consultation response received to the 'Options for Consideration' document and key issues arising from this engagement process. The formation of Pre-Submission policy options also considers any recent changes in national policy and updates to the evidence base which supplements the policy and evidence review undertaken within the key issue papers listed in the introduction. The assessment below also takes into account key conclusions of the sustainability appraisal, habitats regulations assessment, health impact assessment and equalities impact assessment undertaken for the 'Options for Consideration' Core Strategy. A summary of all the proposed Pre-submission policy options for the Meeting Local Needs chapter is set out at the end of this paper.

Issue and Options Identified in 'Options for Consideration' Core Strategy:

Should we have a policy which specifies which mix of dwelling sizes and types should be built?

Preferred Option LN 1

Dwelling size and mix - no reference to threshold

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market.

Non Preferred Option LN 2

Dwelling Size Mix - threshold of 10

On residential sites of 10 or more units, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment, and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market.

Non Preferred Option LN 3

Dwelling size and Mix - no reference to threshold

The size and type of new market and affordable dwellings will reflect current and projected local housing needs and demands identified in the latest Strategic Housing Market Assessment, and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Developments should incorporate:-

- Market Housing - A mix of dwelling sizes that meet the identified need for smaller dwellings (2 bed) while also allowing for sufficient provision of family housing (3 + bed)
- Affordable Housing - A mix of dwellings sizes that meet the needs for 1, 2 and 3 bed affordable housing.
- All housing - A sustainable mix of dwelling types that meet the needs of all household groups including older persons, people with special needs, single person households, families with children and those unable to afford market housing.

Non Preferred Option LN 4

Dwelling size and mix – threshold of 10 or more.

On residential sites of 10 or more units, the size and type of new market and affordable dwellings will reflect current and projected local housing needs and demands identified in the latest Strategic Housing Market Assessment, and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Developments should incorporate:-

- Market Housing - A mix of dwelling sizes that meet the identified need for smaller dwellings (2 bed) while also allowing for sufficient provision of family housing (3 + bed)
- Affordable Housing - A mix of dwellings sizes that meet the needs for 1, 2 and 3 bed affordable housing.
- All housing - A sustainable mix of dwelling types that meet the needs of all household groups including older persons, people with special needs, single person households, families with children and those unable to afford market housing

Consultation Response

Option	Support	Object	No Opinion	Total
LN1	8	6	0	14
LN2	1	0	0	1
LN3	0	0	0	0
LN4	1	0	0	1

Table 2.1

2.2 Comments

2.3 The comments from key stakeholders and the general public in respect of this Option have been grouped together into various themes and are as follows:

2.4 No threshold / Threshold of 10

2.5 Only one respondent commented on the threshold issue - Tetlow King - stating that having no threshold for this policy could stifle development. They support the policy but believe that it should not be applied to small developments. They have a preference for LN2 and a threshold of 10. Whilst it does not set a specific threshold, PPS 3 states that smaller sites and strategic sites should be considered differently.

2.6 Response

2.7 The alternatives of no threshold / threshold of 10 for a housing mix policy were included in the Options for Consultation as the question of whether there should be a threshold or not was not asked at Issues and Options stage. It is significant that only one respondent commented on the threshold issue. Option LN1 has the most support (8) compared with just 1 for LN2 and 1 for LN3. The other objections to LN1 objected to the principle of a housing mix policy rather than the lack of a threshold. This implies that the threshold issue is not critical, due to the lack of comments received, although this has to be seen in the context of a low response generally.

2.8 Evidence on housing supply (long term and more immediate from recent planning permissions) and housing completions, (Strategic Housing Land Availability Assessments, 5 Year Housing Land Supply, Residential Monitoring) indicates that a large number of small housing sites should come forward in the plan period.

2.9 PPS3 (revised June 2011) contains advice in paragraphs 22-23 on the importance of influencing housing size and mix. The principles are supported in the draft national Planning Policy Framework (paragraph 111).

2.10 PPS 3 does distinguish between large strategic sites and smaller sites in achieving a mix of housing (para 24). However, it still advises that for smaller sites the mix of housing should have regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality. Thus the application of a policy influencing housing mix to smaller sites is supported by national policy. It is accepted that the type and mix of dwellings on small sites are largely determined by the nature of the site and its locality. The policy should reflect this by making reference to it applying on a site by site basis, taking into account the character of the local area and the nature of the site.

2.11 Principle of policy specifying mix of house types and sizes

- Object to artificially defining size and type of new market and affordable housing. Pressure should not be exerted on developers to build houses for which there is no demand (St Leonards and St Ives Parish Plan Group)
- Support as housing mix can be driven more by developer profit rather than actual demand.

2.12 Response

2.13 Analysis of recent housing provision (Annual Monitoring Reports) with evidence of different household types in need (Strategic Housing Market Assessment, Housing Needs and Demands Survey) has shown that there has been a mismatch between the size and type of dwelling provided and household requirements.

2.14 Evidence has shown that there has been a mismatch between the housing that has been built recently in Christchurch and East Dorset and the requirements of large number of households. There is a view from the community that the housing mix of recent new developments is unbalanced. A recent revision of PPS 3 (June 2011) retains advice on the importance of policies to influence housing size and mix. The key is to get an appropriate mix of dwellings to meet local requirements. It is, however, accepted that it would be inappropriate to specify the type and mix of dwellings in a policy. This would not allow sufficient flexibility for the market. The aim of the policy is to provide a broad balance of dwellings over the lifetime of the plan that meet the economic and social requirements of the area. Each site contributes to the whole picture. The policy seeks to allow for intervention if it is shown that the delivery of housing is not meeting the economic and social requirements of the area, as identified in the Strategic Housing Market Assessment.

2.15 Issues with Evidence Base

- The Strategic Housing Market Assessment identifies district-wide need and may not reflect specific demands within different areas (including Tetlow King)

- Evidence base out of date, particularly in respect of demand for market housing (BNP Paribas Estate)
- Problem of people registering on multiple housing lists must be addressed as this invalidates housing needs data (The Housing Theme Action Group for East Dorset)

2.16 Response

2.17 As stated previously, the policy aims to deliver a broad range of size and type of dwelling across the area, which forms part of the Strategic Housing Market Assessment.

2.18 The 2008 Strategic Housing Market Assessment has recently been updated. Relevant information has been summarised below in the Consideration of Policy and Evidence section (para 2.37 onwards). This provides more up-to-date evidence on the requirement for different types and sizes of dwelling in the market and affordable sectors down to district level.

2.19 Impact on provision of affordable housing

- Concerned if no threshold stated, this could lead to a reduction of affordable housing (Synergy Housing)
- Policy should seek to maximise affordable housing. Endless building of luxury market housing is unsustainable. (Housing Theme Action Group for East Dorset)

2.20 Response

2.21 This policy does not relate to how much affordable housing is to be provided. When it refers to providing a mix/type of housing it is concerned with whether they are flats/bungalows/terraced/semi/detached. Additionally, it relates to those dwellings subject to restrictions e.g. Over 55's only and care homes.

2.22 Types of housing

- Criteria should be set out on how to consider new care homes proposals
- Councils should adopt planning rules to oblige new care homes and Extra Care schemes to provide affordable housing.
- It is the intention of Dorset County Council and the Primary care Trust to resist building of care homes unless there is an agreed identified need.
- Support building of Extra Care Housing developments together with more intensive community based services that can be delivered to people in their own homes (all 4 bullet points - Adult Services, Dorset County Council)
- Would like to see more sheltered accommodation.(including Wimborne Civic Society)

- Good quality care for older people in their own homes should be a priority.
- The need for more sheltered accommodation is raised by a few people and also in the Housing Focus Group.

2.23 Response

2.24 It is noted that all the comments on types of housing needed in the area relate to elderly person's housing and the need for community services to enable people to stay within their own home. The issue of criteria to assess applications for new care homes is too detailed for this policy.

2.25 The Strategic Housing Market Assessment Update 2011 estimates that there is a requirement for 32% of specialist accommodation in the private sector and over 40% in the affordable sector within the Bournemouth / Poole Housing Market Area (no district figures are available). These figures are quite high when compared with the current estimated stock of specialist housing within the Housing Market Area and reflect the requirements of an ageing population. These findings in the Strategic Housing Market Assessment will inform the type of new housing to be delivered.

2.26 The issue of whether affordable housing requirements should relate to care homes needs careful consideration. Although the concept is to be supported, there are concerns over the practicalities of enforcing the affordability of bed spaces.

2.27 Housing Focus Group 8 December 2010

2.28 As part of the Core Strategy 'Options for Consideration' consultation a Housing Focus Group was held to discuss the consultation options. The Focus Group comprised a wide range of representatives of housing issues including Housing Associations, housing department staff, developers and local agents.

2.29 Relevant points raised in relation to Options LN1 - LN4 included:

- There was a recognition that the market does not always result in the most appropriate mix of housing, with a proliferation of 2 bed flats not selling in Bournemouth as an example. However we need to be aware of the market profile.
- Several people considered there should be a better balance of owner occupied and rented properties. Rented properties mean that people can be more flexible about moving for jobs. There is a small private rented sector in Christchurch and East Dorset. There was concern about young people having to move to Bournemouth where there is more of a mix of housing.
- There needs to be a supply of shared housing for single people, which could retain young people in the area.
- There needs to be more terraces/semi detached with gardens and parking rather than all detached. Also more innovative design to provide different types of properties - e.g. 3 storey properties with single storey flats on ground floor and two storey maisonettes.
- There is a market for good quality sheltered housing, which could have a positive impact on the aspiration of releasing housing stock.

2.30 Response

2.31 The points raised at the focus group indicate support of the need for a policy to influence size and type of new housing.

Consideration of Evidence and Policy

2.32 The policy approach in LN1 - 4 remains consistent with national policy in PPS 3 Housing (latest revision June 2011) which retains paragraphs 20 - 24. It also reflects paragraph 111 of the draft National Planning Policy Framework.

2.33 Evidence in the Strategic Housing Market Assessment (2008) and Housing Needs and Demand Study 2009 informed the development of the options. The results are summarised in the Core Strategy Key Issue Paper 13: Delivering Suitable and Sufficient Housing - see paragraphs 4.18 - 4.22.

2.34 Since then the Bournemouth / Poole Strategic Housing Market Assessment Update has been published. Relevant evidence on housing mix is summarised below.

2.35 The table below shows the profile of households likely to have a demand for market housing in the near future so is useful for looking at short term demands.

	Christchurch	East Dorset
Older Persons	31.5%	28.9%
Single non-pensioner	12.4%	10.5%
Multi-adult	34.3%	37.6%
Households with children	21.8%	22.9%

Table 2.2 Household types requiring market housing, Source: Bournemouth/Poole Strategic Housing Market Assessment Update 2011

- For both authorities the largest groups requiring housing are multi-adult followed by older persons. Multi-adult households are households with two or more adults under pensionable age with no children. Christchurch has the largest proportion of older persons' households in Dorset, in particular single pensioner households (19.5%).
- The two districts have similar levels of households with children, with East Dorset having slightly more. Christchurch has more lone parent households (1.3% compared with 0.4% in East Dorset). East Dorset has more larger families, comprising 2+ adults with 2+ children (13.9% compared with 8.2% in Christchurch)

2.36 The table below gives an analysis of longer term housing requirements for different sizes of market housing.

Size of housing unit	Christchurch		East Dorset	
	No.	%	No.	%
1 bedroom	-3	-1.8%	4	1.7%
2 bedroom	59	39.1%	86	36.7%
3 bedrooms	75	50.2%	113	47.9%
4+ bedrooms	19	12.4%	32	13.8%

Table 2.3 Estimated housing requirements 2011 - 2031 by size - market housing (per annum) Source: Bournemouth/Poole Strategic Housing Market Assessment Update 2011

- Christchurch and East Dorset have similar proportions of housing requirements in the private sector.
- For both authorities the most significant shortfall is for 3 bedroom properties followed by 2 bedroom properties, then 4 bedroom.
- The results suggest a small surplus in 1 bedroom properties in Christchurch whereas there is a small requirement for 1 bed units in East Dorset.

2.37 The table below gives an analysis of longer term housing requirements for different sizes of affordable housing.

Size of housing unit	Christchurch		East Dorset	
	No.	%	No.	%
1 bedroom	31	47.4%	32	31.5%
2 bedroom	20	30.3%	44	43.3%
3 bedrooms	13	20.8%	21	20.4%
4+ bedrooms	1	1.5%	5	4.8%

Table 2.4 Estimated housing requirements 2011 - 2031 by size - affordable housing (per annum) Source: Bournemouth / Poole Strategic Housing Market Assessment Update - 2011

- For both authorities the greatest requirement in the affordable sector is for one and two bedroom accommodation, with over 70% of all additional properties needed within this size.
- Christchurch has a significant requirement for 1 bed properties (47%) followed by 2 bed whereas for East Dorset the most significant requirement is for 2 bed properties (43%) followed by 1 bed.
- The requirement for 3 bed properties is similar. Although relatively low, East Dorset has a higher requirement for 4 bed properties than Christchurch.

2.38 The Strategic Housing Market Assessment update provides an analysis on the types of housing likely to be required in the future, split into two broad built-forms - house/bungalow and flat/maisonette. This data was not provided in the previous Strategic Housing Market Assessment . The analysis is across the Bournemouth / Poole Housing Market Area and is not broken down further into districts.

Type of Dwelling	Number	Percentage
Market Housing		
House / bungalow	1,124	85.2%
Flat / maisonette	195	14.8%
Affordable Housing		
House / bungalow	280	49.5%
Flat / maisonette	285	50.5%

Table 2.5 Estimated housing requirements to 2031 by type of dwelling (per annum) across the Bournemouth / Poole Housing Market Area Source: Bournemouth / Poole Strategic Housing Market Assessment Update - 2011

- Across the Housing Market Area the greatest requirement for the market sector is for houses and bungalows, with only a small requirement for additional flats / maisonettes provided (14.8%)

2.39 The Strategic Housing Market Assessment update provides estimates of the likely requirement of some form of specialist accommodation - i.e. sheltered housing, extra care scheme, residential care home or nursing home. The analysis is across the Bournemouth / Poole Housing Market Area and is not broken down further into districts.

Type of Dwelling	Number	Percentage
Market Housing		
Specialist	420	31.8%
Ordinary residential	900	68.2%
Affordable Housing		
Specialist	243	43.0%
Ordinary residential	322	57.0%

Table 2.6 Estimated housing requirements to 2031 by specialist housing (per annum) across the Bournemouth / Poole Housing Market Area Source: Bournemouth / Poole Strategic Housing Market Assessment Update - 2011

- These figures are quite large when compared with the current estimated stock of specialist housing within the Housing market Area (1.4% market housing and 31.0% affordable). These reflect the ageing population.

‘Options for Consideration’ Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN1	Non Preferred Option LN2	Non Preferred Option LN3	Non Preferred Option LN4
8: Suitable and affordable housing	Strong Positive Impact	Positive Impact	Strong Positive Impact	Positive Impact
12: Sustainable economic growth	Strong Positive Impact	Strong Positive Impact	Strong Positive Impact	Strong Positive Impact

Table 2.7

2.40 The SA concluded that all options have a strong positive impact on housing and economic objectives. Options LN2 and LN4 record a positive rather than a strong positive impact on housing objectives as both have thresholds of 10 or more, therefore the policy will be only applied to larger sites.

‘Options for Consideration’ Habitats Regulations Assessment

2.41 The Habitats Regulations Assessment for Options LN1 - LN4 concluded that they are not likely to have a significant effect on the integrity of any European site in Christchurch or East Dorset (+15km). These options do not result in development; instead they relate to criteria for development.

‘Options for Consideration’ Health Impact Assessment

2.42 The Health Impact Assessment identifies no clear adverse impact but identifies positive impacts for housing and built environment objectives. Appropriate housing is required to meet the needs of the population.

‘Options for Consideration’ Equalities Impact Assessment

2.43 The Equalities Impact Assessment did not identify any adverse impacts on any particular community groups. These policy options would reflect the needs of the area and would be of benefits to all groups, but in particular it would help those in housing need. Positive impacts were identified for age, disability and areas of deprivation.

Infrastructure Requirements

2.44 There are no infrastructure requirements associated with this policy.

Conclusions

2.45 The results of consultation support Option LN1. There was only one objection to a threshold of 10. Evidence and policy supports a policy influencing housing size and mix on all sites, particularly as the majority of sites that are likely to come forward for housing within the plan area are small in size. However it is important to have regard to what is practically possible on a site. The options for the mix of dwelling sizes and type should also be seen in the context of Options LN11 -15 which deal with affordable housing provision.

2.46 The Sustainability Appraisal shows that LN1 has a strong positive impact and scored higher than LN2 and LN4 as there is no threshold. There are no adverse impacts for LN1 - 4 identified in the Habitats Regulations Assessment, Health Impact Assessment and Equalities Impact Assessment.

2.47 The principle of a policy influencing housing size and mix is supported by the majority in consultation and also by national policy and evidence. The 2011 Update of the Strategic Housing Market Assessment provides more up-to-date evidence on issues relating to housing mix in relation to house size and tenure and for the first time provides evidence on type of housing and specialist accommodation requirements.

2.48 The Strategic Housing Market Assessment 2011 update shows that the results of analysis on short and long term requirements have changed since the original study, as well as providing evidence on issues that were not included previously. It is important to be able to react in good time to changes in economic conditions. It would therefore be inappropriate to set standards in that policy that cannot be changed quickly. Therefore it would not be appropriate to have a more detailed policy which summarises the results of analysis in the wording of the policy, as set out in Options LN3 and LN4.

2.49 Option LN1 which makes reference to using the latest Strategic Housing Market Assessment and ongoing Annual Monitoring Report research to inform the size and mix of dwellings provided, would seem the most appropriate option to take forward. However, it is concluded that additional wording is required to cater for the impact of local character and site characteristics to influence the appropriate size and mix of dwellings.

Issue and Options Identified in ‘Options for Consideration’ Core Strategy:

If we are to have policies seeking to control the size of housing, what issues are important?

Preferred Option LN 5

New housing will be built to Living Space Standards defined in a Supplementary Planning Document.

Consultation Response

Option	Support	Object	No Opinion	Total
LN5	5	1	0	6

Table 2.8

2.50 Supporting comments included:-

- As well as ensuring adequate space standards, it is important to ensure that both private and affordable housing is provided to the same standards. (Synergy Housing)
- Support no more than 35 to hectare, complimentary to existing properties in West Parley (West Parley Parish Council)
- This increases flexibility in potential use of dwellings and will ensure that any surplus market housing can be occupied by those on waiting lists rather than remaining outside the "suitable" category as other market homes are at present. (Environment TAG, East Dorset)

2.51 Objecting Comments

- Question whether LN5 will not be required due to Government statement at end of 2010 that these standards will not be implemented but instead all market and affordable housing should be built to the same standard.
- Localism agenda may mean local authorities can set their own standards but councils should await further announcements before deciding how to progress their own standards (Tetlow King and Woolf Bond Planning)

2.52 Response

2.53 It has not been possible to find any Government statements along the lines that the objector refers to. The Government do not appear to have made any statements about the previous government's commitment to work towards all new housing to be built to Lifetime Homes Standards by 2013. As they have remained silent on this issue, it seems reasonable to conclude that these targets will not now be realised.

2.54 If there are no announcements from Government on the need for room size standards or adherence to Lifetime Homes standards, the localism agenda will indeed mean that local authorities can set their own standards.

2.55 Housing Focus Group 8 December 2010

2.56 As part of the Core Strategy 'Options for Consideration' consultation a Housing Focus Group was held to discuss the consultation options. The Focus Group comprised a wide range of representatives of housing issues including Housing Associations, housing department staff, developers and local agents.

2.57 Relevant points raised in relation to Option LN5 included:

- The principle of living space standards and use of Supplementary Planning Document was agreed with, as long as these are consistent with Homes and Community Agency standards.
- Homes and Community Agency will require Code Level 3 housing on all affordable homes.
- Standards used by Housing Associations are now to be scrapped so are not available as a guide.
- The Code for Sustainable Homes also helps with room sizes as does Lifetime Homes. Level 3 of Code may overcome need for space standards.
- Properties should be designed to take account of home working.
- Better noise insulation standards between buildings may make terraces and semi-detached properties more attractive.
- Need a flexible design code which sets minimum standards based on local requirements.
- Concerns that if space standards introduced how Council can meet requirements for efficient use of land and achieve density levels likely to be included in Core Strategy.
- Staff resources in Councils are important if design standards are introduced.

2.58 Health and Community Issues Focus Group 22 November 2010.

2.59 The following points were raised in relation to Option LN5

- Living space standards are important to the quality of life. More space leads to better community relations and less noise issues as well as better mental health. Space in houses affects people's lifestyles and overcrowding can lead to mental health issues.
- It's important to have living rooms that cannot be converted into bedrooms.

Consideration of Evidence and Policy

2.60 PPS1 (Delivering Sustainable Development) requires that Councils should take into account social cohesion and inclusion when planning their areas, in order to promote personal well-being through the delivery of safe, healthy and attractive places to live.

2.61 Evidence prepared for CABE by the University of London in April 2010, identifies that poor living space standards have detrimental impacts on health, well-being, educational attainment, family welfare and anti-social behaviour. Similar conclusions were reached by consultants reporting to the Mayor of London in 2006 in relation to Housing Space Standards. Consequently, policies setting out minimum space standards have been adopted throughout London and elsewhere e.g. Bristol and Mid Sussex.

2.62 At present standards for social housing provision are set using the Homes and Communities Agency Housing Quality Indicators. No standards apply to private dwellings and as the evidence studies produced for CABE and the Mayor of London show that this has resulted in homes becoming smaller. Although many planning applications in East Dorset and Christchurch are for dwellings that would satisfy the Housing Quality Indicators, there are some that do not and this gives concern for the health and well-being of residents.

2.63 The Mayor of London report contains a set of space standards that are designed to set minimum requirements in key habitable parts of the dwelling. The Mayor produced a draft London Housing Design Guide in 2009 which included the setting of new minimum internal space standards. The guide is part of the draft London Housing Strategy. The intention was that the standards will start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011. The London Plan was published in July 2011 and included minimum space standards that are to be applied to new affordable and market homes.

2.64 In the previous Government's national strategy for housing in an ageing society, "Lifetime Homes, Lifetime Neighbourhoods" (CLG 2008) there was an intention that all new housing with public funding will be built to Lifetime Homes standard in 2011. The regulation for private housing in England to be built to the Lifetime Homes standard may be brought in from 2013, the decision on this being dependent on the Government's review of progress in 2010. The review of progress has not taken place and there have been no announcements on Lifetime Homes or the more general issue of room size standards for new housing, so it would seem that the previous Government's target is not going to be achieved.

2.65 In November 2010 the Housing Minister confirmed that the Homes & Communities Agency will retain the Design and Quality Standards 2007 inherited from the Housing Corporation. This encourages affordable housing providers to build to Lifetime Homes standards. The opportunity to require all social housing to be built to Code 4 of the Code for Sustainable Homes (where Lifetime Homes is mandatory) was not taken.

'Options for Consideration' Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option
7: Healthy Lifestyles	Strong Positive Impact

Relevant Sustainability Appraisal Objectives	Preferred Option
8: Suitable and affordable housing	Positive Impact

Table 2.9

2.66 The Sustainability Appraisal concluded that the introduction of living space standards will have a positive impact on healthy lifestyles and housing objectives. However, there are concerns that the introduction of such standards will reduce the supply of new housing.

‘Options for Consideration’ Habitats Regulations Assessment

2.67 The Habitats Regulations Assessment for Option LN5 concluded that it is not likely to have a significant effect on the integrity of any European site in Christchurch or East Dorset (+15km). This option does not result in development; instead it relates to criteria for development.

‘Options for Consideration’ Health Impact Assessment

2.68 The Health Impact Assessment identifies no adverse impacts but identifies a positive impact on housing objectives. This policy will support the quality of housing in the future, which is vital to the well-being of residents.

‘Options for Consideration’ Equalities Impact Assessment

2.69 Positive impacts were recorded for those groups in the community affected by age or disability and those living in areas of deprivation. This proposal would be of particular benefit to older people and those with disabilities although the residents in general would benefit.

Infrastructure Requirements

2.70 This policy does not give rise to infrastructure requirements.

Conclusions

2.71 Although the response to the Option was small it has been received favourably. There is strong evidence to show that poor living space standards have a detrimental impact on health, well-being, educational attainment, family welfare and anti-social behaviour. Minimum living space standards are set for social housing through the Homes and Communities Agency Housing Quality Indicators (HQI). There are no standards for private housing and this has resulted in some applications being significantly smaller than the HQI. This also means that it is difficult to transfer stock from the private sector to the social sector as the private homes are not large enough to meet the HQI.

2.72 On the basis that the Option received support in the consultation and the weight of the evidence base it is considered appropriate to pursue a policy that requires minimum living space standards. These should initially be based on the HQI and further consideration given to bespoke standards in a Supplementary Planning Document if justified by new evidence.

Issue and Options Identified in 'Options for Consideration' Core Strategy:

How do we ensure that the density of development is appropriate?

Preferred Option LN 6

On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Balanced Housing Markets assessment in the Strategic Housing Market Assessment and future Annual Monitoring Reports.

Proposals for high density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area.

- New greenfield housing sites (density range to be determined by outputs of master planning process)
- Town centres
- Along the Prime Transport Corridors
- Areas outside town centres with good access to public transport and essential facilities and services
- In areas where there is a high level of need for affordable housing or on land already owned by housing associations.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

Non Preferred Option LN 7

On all sites the design and layout of new housing development should maximise the net density of development to a level which is acceptable for the locality. Density of new development will be within the following ranges, unless the design solution for such a density would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Balanced Housing Markets assessment in the Strategic Housing Market Assessments and future Annual Monitoring Reports.

Type of Area	Net Density Range
Urban extension sites	40 – 60 dph*
Town centres	40 – 120 dph
Areas along Prime Transport Corridors and in close proximity to employment areas and essential community facilities.	40 – 70 dph
In areas where there is a high level of need for affordable housing or on land already owned by housing associations	40 – 70 dph
Suburban areas – areas with predominantly lower density development	30 – 55 dph
Villages (population under 3,000)	30 – 70 dph

Table 2.10

* Range to be determined by outputs of master planning process.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

Consultation Response

Option	Support	Object	No Opinion	Total
LN6	9	3	0	12
LN7	1	2	0	3

Table 2.11

2.73 Comments on LN6

2.74 The comments from key stakeholders and the general public in respect of this Option have been grouped together into various themes and are as follows:

2.75 Principle of Density Policy

- Object as option now out of step with revised PPS 3 which removes minimum density thresholds. Density is as a result of good master planning rather than adherence to a prescribed figure (St Leonards and St Ives Parish Plan Group and Woolf Bond Planning)

2.76 Response

2.77 The revised PPS 3 still requires land to be used efficiently. As long as there are adequate safeguards within the policy to ensure that there are no conflicts with local character and distinctiveness of an area, the encouragement of a minimum density of 30dph is considered to be an appropriate approach to retain. The Strategic Housing Land Availability Assessment is based on this density and if this threshold is removed, this may raise issues for housing delivery.

2.78 Sustainable location

- Support provision of high density development in areas that are considered sustainable. LN6 is preferable to LN7 as it restricts the location of high density developments to sustainable locations (Highways Agency)
- The sustainability and quality of housing to be developed is important when delivering higher density development (Synergy Housing)
- Support higher density residential development in town centre locations. Provides flexibility in use of densities in order to maximise use of housing land (BNP Paribas Real Estate)
- Simply having good access to public transport is inadequate if services are infrequent or unreliable (Environment Theme Action Group, East Dorset)

2.79 Urban Extension Sites

- LN6 - Master plan documents not considered impact of new neighbourhoods on adjacent development or undeveloped land. Arbitrary selection of areas for comparison. Proposed high densities likely to be unacceptable to local communities if dramatically different from neighbouring land use. (Environment Theme Action Group, East Dorset)
- LN7 - Not all proposals for the urban extensions will be compatible with a housing density of 40-60dph. (Environment Theme Action Group, East Dorset)

2.80 Response

2.81 Understanding the site and surrounding context is an important component of the masterplanning process. The masterplanning reports contain an analysis of the surrounding urban character to the new neighbourhood sites, in particular looking at housing density in nearby areas.

2.82 Land owned by Housing Associations

- Welcome encouraging higher densities on land owned by housing associations. However housing associations will often apply for planning permission on sites for which they have an option rather than own the land. Therefore we recommend that policy reworded as follows:-"In areas where there is a high level of need for affordable housing or on land already owned by housing associations or where a housing association is the applicant" (Tetlow King).

2.83 Response

2.84 Agree with suggested amendment.

2.85 Comment on LN7

- A dwellings per hectare of 120 is ridiculously high, even in central London. This option should be deleted (St Leonards & St Ives Parish Plan Group)

2.86 Response

2.87 A maximum of 120 dwellings per hectare is indicated for town centres only, where it is possible to successfully accommodate higher densities of development .

2.88 Environment Theme Action Group (East Dorset)

2.89 Not supported. Not all proposals for the new neighbourhoods/urban extension sites will be compatible with a housing density of 40-60dph

2.90 Response

2.91 It is agreed that the East Dorset New Neighbourhoods, if they are to be delivered, should be done so within a wide range of densities. This will rely on local circumstances and should be determined by existing landscape and built character. Masterplanning will inform appropriate densities for the new neighbourhoods.

Consideration of Evidence and Policy

2.92 PPS3: Housing advises local planning authorities to develop housing density policies having regard to the level of housing demand and need, availability of land, capacity of infrastructure, accessibility, characteristics and design. The efficient use of land is a key consideration in planning for housing. In June 2010, paragraph 47 of PPS 3 was revised to delete the reference to a national minimum density of 30 dwellings to the hectare. However the Strategic Housing Land Availability Assessment is based on this minimum density and it is considered that this is an appropriate approach to retain to enable housing targets to be met.

2.93 Draft National Planning Policy Framework (2011) states that to boost the supply of housing, local planning authorities should set out their own approach to housing density to reflect local circumstances (para 109).

2.94 Evidence from Christchurch and East Dorset **Annual Monitoring Reports (2009/10)** on the density of completed residential development shows that in 2005 - 9 an average of 22% in Christchurch and 45% in East Dorset of new dwellings were completed at a density of less than 30dph, reflecting that more flats schemes were completed in Christchurch over this period, but also showing that redevelopment of existing dwellings within low density dwellings has respected the character of the urban form in these areas.

'Options for Consideration' Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN6	Non Preferred Option LN7
2: Sustainable use of resources	Strong Positive Impact	Strong Positive Impact
3: Minimise pollution	Positive Impact	Positive Impact
4: Climate change	Positive Impact	Positive Impact
5: Reduce the need to travel	Strong Positive Impact	Strong Positive Impact
7: Improve health	Uncertain Impact	Uncertain Impact
8: Suitable and affordable housing	Positive Impact	Positive Impact

Relevant Sustainability Appraisal Objectives	Preferred Option LN6	Non Preferred Option LN7
11: Local distinctiveness	Positive Impact	Positive Impact

Table 2.12

2.95 Both options record equally positive impacts on a number of Sustainability Appraisal objectives. An uncertain impact is identified on health due to the conflict of higher density development resulting in unreasonably smaller room sizes and garden areas. However this potential impact can be mitigated by the production of Living Space Standards, as put forward in Option LN5 above.

‘Options for Consideration’ Habitats Regulations Assessment

2.96 The Habitats Regulations Assessment concluded that it was not possible to assess whether Options LN6 and LN7 are likely to have significant effects on European sites as it would be dependent on the exact location of the proposed high density developments and whether an appropriate level of Suitable Alternative Natural Greenspace is provided. The Habitats Regulations Assessment identifies a range of mitigation measures such as best practice construction techniques and provision of Suitable Alternative Natural Greenspace alongside new development. Further measures to relieve pressure are also likely to be implemented through the emerging Heathlands Joint Development Plan Document and SE Dorset Green Infrastructure Strategy. The Core Strategy also sets out policies which seek to restrict emissions from transport and energy generation, and minimise water usage within new developments (Objective 3; Objective 6; KS19; KS20 and ME7).

‘Options for Consideration’ Health Impact Assessment

2.97 The Health Impact Assessment identifies no adverse impacts but identifies positive impacts for housing and built environment objectives. Promoting the right level of density for an area and for the needs of residents is important to their well being.

‘Options for Consideration’ Equalities Impact Assessment

2.98 The Equalities Impact Assessment identifies positive impacts on those community groups distinguished by age and disability and those living in rural isolation. These options propose higher density development in locations where access is good. Whilst everyone would benefit from the increased accessibility, older and younger people and those with disabilities would benefit in particular.

Infrastructure Requirements

2.99 This policy does not give rise to infrastructure requirements.

Conclusions

2.100 Both options score equally positively when assessed against the Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment. Option LN6 has more support from consultation than Option LN7. Existing and emerging national planning policy would appear to support the approach taken in Option LN6 rather than LN7, as LN7 is more prescriptive, setting out density ranges. There is a wide variation in the built character of the area which means it would be inappropriate to impose standard density requirements. Option LN6, which indicates the types of location where high density developments would be acceptable, is a more appropriate policy approach to take forward. In the interests of efficiency of use of land it is proposed to retain the reference to an encouragement of a minimum net density of 30dph. The Strategic Housing Land Availability Assessment is based on this approach and the retention of a minimum density is important to enable housing targets to be met. There are sufficient safeguards within the policy to ensure that new housing respects the character of an area. The suggested amendment from Tetlow King to add the words "or where a housing association is the applicant" after "on land owned by housing associations" to take into account situations where a housing association has an option on the land but is not the owner, is agreed.

2.101 In conclusion Preferred Option LN6 is considered to be an appropriate approach for a policy on the density of housing development subject to the following amendment:-

2.102 Final Bullet point - Add the words " or where a housing association is the applicant" at the end of the sentence,

Issue and Options Identified in 'Options for Consideration' Core Strategy:

What criteria should be used to assess proposals for Gypsy and Traveller and Travelling Showpeople sites?

Preferred Option LN 8

The required provision of allocated permanent and transit pitches will be addressed through joint working with other Dorset authorities in the Dorset Gypsy & Traveller Site Allocations Development Plan Document to provide a co-ordinated approach to provision. This Development Plan Document will also consider the accommodation needs of Travelling Showpeople and will seek to identify two plots within the County to meet this need.

1. The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:-
2. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, medical facilities and public transport;
3. Sites should provide for adequate on-site facilities for parking storage, play and residential amenity;
4. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
5. Sites should not have a detrimental impact on the amenities of adjacent occupiers; and
6. Sites should not result in a detrimental impact on the natural environment

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

7. Well related to the public highway network to accommodate the passage of large vehicles,
8. Located so as to minimise the impact of on-site business activities on neighbouring properties,
9. Located so as to minimise the visual impact of the uses on the landscape.

Consultation Response

Option	Support	Object	No Opinion	Total
LN8	3	4	0	7

Table 2.13

2.103 The comments from key stakeholders and the general public in respect of this Option have been grouped together into various themes and are as follows:

2.104 Pitch Numbers

- Welcome development of policy and commitment to work with other authorities to produce a Development Plan Document for the county. However have some concerns about numbers that Councils intend to plan for. Disagree with Dorset joint response to the Regional Spatial Strategy Proposed Changes which put forward a 40% reduction on Regional Spatial Strategy figures. Council should provide for numbers identified in the Regional Spatial Strategy partial review and quoted in the key facts. (Friends and Families of Travellers Group).

2.105 Response

2.106 Emerging government guidance (draft Planning for Traveller Sites PPS April 2011) indicates that local planning authorities will be responsible for determining the right level of site provision in their area. Top-down site targets will be replaced with a duty on councils to work together across boundaries to plan for sites. The Dorset Gypsy Traveller and Travelling Site Allocations Development Plan Document Issues and Options Consultation, published for consultation in November 2011, included consultation questions on estimates of needs. It is intended to provide an update of the need for pitches, taking into account up to date evidence of the existing supply and local needs. The Core Strategy will not be setting pitch figures.

2.107 Criteria 2 Location of sites

- Criterion 2 requires sites to be located in close proximity to facilities without identifying what close proximity means. This is unreasonably restrictive. It overly limits potentially available sites and ignores advice in Circular 01/2006 which recognises difficulties which gypsies and travellers have in finding affordable land and that local planning authorities need to be realistic about alternatives to the car in accessing services. Suggest replace the word "close" by the word "reasonable".(Friends and Families of Travellers Group)
- Sites should not be located near to an existing settled community as conflicts can occur between gypsies and existing residents of towns or villages.

2.108 Response

2.109 In response to the Friends and Families of Travellers Group comments on Criterion 2. The lack of a definition of "close" allows flexibility. It would be more onerous to provide a definition by reference to a distance threshold to different categories of facilities. The advice in Circular 01/2006 that the respondent refers to has been taken into account when developing site assessment criteria in the emerging Joint Development Plan Document. Although all sites have been assessed for their relative accessibility to key services no sites have been rejected at an early stage due to their relative remoteness from such services, as this recognises the practical difficulties of finding gypsy and traveller sites.

2.110 In response to the second comment, Government policy in Circular 01/2006 identifies the following locations as being appropriate for gypsy, traveller and travelling showpeople sites:- sites on the outskirts of built up areas and sites within rural or semi-rural settings. However it advises that "local authorities should first consider locations in or near existing settlements with access to local services, e.g. shops, doctors and schools" (para 65).

2.111 Emerging policy in the draft PPS refers to the need for "appropriate locations" for sites. Sites should be sustainable economically, socially and environmentally. There is an emphasis on early community engagement of planning for sites which will make it more likely that members of the settled community will accept traveller development. Not only will this help to reduce tension between the traveller and settled community, but it will make it more likely that development will take place in sustainable locations. This will benefit the traveller community by providing greater access to education and health services as well as employment.

2.112 Sites within the Green Belt

- The policy should be amended to say that sites should not be located on the Green Belt.

2.113 Response

2.114 Government policy in Circular 01/2006 and in emerging draft PPS advises that national planning policy on green belts applies equally to applications for planning permission from gypsies and travellers and the settled population. Traveller sites in the Green Belt are inappropriate development. However an allowance can be made for an exceptional limited alteration to the Green Belt to meet a specific identified need for a traveller site which cannot be met elsewhere. This can only be undertaken when opportunities for development within the urban area or land not in the Green Belt have been fully considered. This is important in Christchurch and East Dorset where early information from the Development Plan Document indicates that the opportunity to meet traveller needs on suitable sites within the urban area or outside of the Green Belt are very limited.

2.115 Criteria 5 and 6 - Impact on amenities and natural environment

- Criteria 5 and 6 both use the word "detrimental" in relation to impacts on residential amenity and natural environment. Using this word without balancing impact on the benefits of meeting needs is unduly restrictive. Any development can be held to have some sort of detrimental impact on amenity and the natural environment. Its use in this context opens the door to NIMBY objections based on racial prejudice. Suggest word "unacceptable" be inserted before word "detrimental" in the second criterion. This will ensure local planning authorities can strike a balance between need and impact and resist racially motivated objections. (Friends & Families of Travellers)
- Support reference to need to ensure that the siting of gypsy and traveller sites should not have a detrimental impact on the natural environment. (RSPB)

2.116 Response

2.117 The objective of these criteria is to ensure that the form of the development is compatible with its surroundings and does not have an unacceptable impact on the natural environment in particular. This is of particular importance within the Plan area where there are numerous environmental designations that need to be taken into account when determining the acceptability of any application. However it is accepted that the word 'unacceptable' can be substituted for 'detrimental' in the second of the two criteria.

2.118 Road network issue

2.119 Support. Would expect to see reference to maintaining the safe and efficient operation of the Strategic Road Network when considering the location for such sites under Option LN8. (Highways Agency)

2.120 Response

2.121 This comment is noted. Safe highway access to a site is a standard requirement of any planning application and does not need a specific reference here.

2.122 Location of potential gypsy and traveller site

2.123 Object to the use of Mannington Site as a transit / permanent site due to proximity to SSSI and high voltage overhead power lines. In view of recent findings regarding childhood leukaemia it would be imprudent to place any person under a high voltage power line. (Holt Parish Council)

2.124 Response

2.125 These comments are related to the location of potential sites. The shortlisted sites were consulted on in the Joint Development Plan Document in November 2011. Comments on individual sites should be made in response to the Development Plan Document and not the Core Strategy which sets out general site location criteria.

2.126 Travelling showpeople sites

- Need a policy for permanent and transit pitches, but what criteria should be used to assess gypsy and traveller and travelling showpeoples sites?

2.127 Response

2.128 The policy distinguishes between the two types of site. Criteria 1 - 6 apply to both gypsy and traveller, and travelling showpeoples' sites. Criteria 7 - 9 apply to travelling showpeoples' sites.

Consideration of Evidence and Policy

2.129 The **Housing Act 2004** imposes a statutory requirement for local authorities to include gypsies and travellers in their Local Housing Needs Assessments and to inform the Local Housing Strategies

2.130 CLG **Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites** advises in paras 31-32 that the Core Strategy should set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant Development Plan Document. These criteria will also be used to meet unexpected demand. The criteria based policies must be fair, reasonable, realistic and effective in delivering sites. Annex C of Circular 01/2006 sets out good practice for criteria policies.

2.131 CLG **Circular 04/2007 Planning for Travelling Showpeople** advises that the Core Strategy should set out criteria for the location of travelling showpeople sites which will be used to guide the allocation of sites in the relevant Development Plan Document. These criteria can be used to guide planning applications on unallocated sites that may come forward.

2.132 CLG **Good Practice Guidance on Designing Gypsy and Traveller Sites (2008)** advises that selecting the right location for a gypsy site is a key element in supporting good community relations and maximises its success.

2.133 CLG **Planning for Traveller Sites Consultation Document (April 2011)** advises that criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.

2.134 The **draft National Planning Policy Framework (July 2011)** sets out the Government's intention that the draft PPS on Planning for Traveller Sites will form part of the National Planning Policy Framework.

2.135 There are existing criteria policies for gypsy and traveller accommodation in both Local Plans.

2.136 Consultation on the Dorset-wide Gypsy and Traveller and Travelling Showpeople Site Allocations Joint Development Plan Document (November 2011) will result in evidence being gathered from the gypsy and traveller community on appropriate locations and types of sites for pitches.

'Options for Consideration' Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN8
1: Habitats and protected species	Strong Positive Impact
2: Sustainable use of resources	Uncertain Impact

Relevant Sustainability Appraisal Objectives	Preferred Option LN8
3: Minimise pollution	Uncertain Impact
4: Climate change	Uncertain Impact
5: Reduce the need to travel	Positive Impact
7: Healthy lifestyles	Strong Positive Impact
8: Suitable and affordable	Strong Positive Impact

Table 2.14

2.137 Uncertain impacts are recorded for sustainable use of resources, pollution and climate change as the potential difficulties of finding sufficient sites within urban areas could raise the possibility of allocating sites in the Green Belt.

‘Options for Consideration’ Habitats Regulations Assessment

2.138 The Habitats Regulations Assessment concluded that it was not possible to assess whether Option LN8 is likely to have significant effects on European sites as it would be dependent on the exact location of the proposed plots. There is potential for indirect significant effects including from visitor pressure - recreational pressure from resident gypsies. However the level of increased traffic and pressure for water supply and treatment that would arise from this option is not considered to be significant. The Habitats Regulations Assessment identifies a range of mitigation measures such as best practice construction techniques and provision of Suitable Alternative Natural Greenspace alongside new development. Further measures to relieve pressure are also likely to be implemented through the emerging Heathlands Joint Development Plan Document and SE Dorset Green Infrastructure Strategy. The Core Strategy also sets out policies which seek to restrict emissions from transport and energy generation, and minimise water usage within new developments (Objective 3; Objective 6; KS19; KS20 and ME7).

‘Options for Consideration’ Health Impact Assessment

2.139 The Health Impact Assessment identifies no clear adverse impacts but identifies a positive impact on housing objectives. This criteria policy is important as it is vital to take account of the special health needs of the travelling population.

‘Options for Consideration’ Equalities Impact Assessment

2.140 The Equalities Impact Assessment identifies positive impact on age, disability and racial groups of the community. All gypsies, travellers and travelling showpeople would benefit from this option, but in particular the young, old and those with disabilities would benefit.

Infrastructure Requirements

2.141 This policy does not give rise to infrastructure requirements.

Conclusions

2.142 The policy has not had majority support, attracting 4 objecting comments and 3 supporting. However there has been a low level of response to this policy option. The objecting comments relate to the issue of sites in the Green Belt, two objections to a specific site, objections to pitch provision numbers and objections to the wording of some criteria. Responses to these issues have been provided above.

2.143 Existing and emerging national planning policy requires local planning authorities to develop criteria policy to guide the location of gypsy and traveller and travelling showpeople sites. The Sustainability Appraisal, Heath Impact Assessment and Equalities Impact Assessments have identified several positive impacts of the policy.

2.144 The proposed policy will set out criteria for the location of gypsy and traveller and travelling show people sites. The issue of setting local targets for site provision will be addressed through the Dorset Gypsy & Traveller Site Allocations Development Plan Document. To provide clarity over the remit of the Core Strategy policy it would seem appropriate to delete the first two sentences of Option LN8 and insert them in the supporting text to the site criteria policy. This makes it clear that the Core Strategy policy is confined to setting out site location criteria issues only.

2.145 In conclusion it is considered that LN8 is an appropriate approach for a site location criteria policy to be taken forward, subject to the following amendments:-

- Delete first 2 sentences and insert into supporting text;
- In criterion 5 delete the word "detrimental" and replace with "unacceptable".

Issue and Options Identified in 'Options for Consideration' Core Strategy:

What overall target should we set for the delivery of affordable housing?

Preferred Option LN 9

The overall target for affordable housing will be 35% of all new residential development delivered up to 2027.

Non Preferred Option LN 10

The overall target for affordable housing will be 40% of all new residential development delivered up to 2027.

Consultation Response

Option	Support	Object	No Opinion	Total
LN9	20	9	0	29
LN10	20	2	0	22

Table 2.15

2.146 Supporting comments to LN9

2.147 Over two-thirds (20) supported Option LN9 as proposed, including Corfe Mullen Parish Council and Synergy Housing. The only comments provided were from Synergy Housing who stated that whilst it will be a stretching target, they firmly supported the provision of as much affordable housing as possible to be provided in the District.

2.148 Objecting comments to LN9

2.149 Two respondents objected as they wished to see a higher target, one suggesting 40% and the other ‘at least’ 40%. Arguments for doing so were that if overall housing targets are driven by the need to provide affordable housing, then affordable housing on Green Belt should be maximised; one respondent wished to see affordable housing on smaller Greenfield sites maximised as they were opposed to large Greenfield site proposals.

2.150 Four objectors considered that 35% was too high but did not provide supporting statements or arguments related to the principles. Three objectors highlighted the adverse impacts of affordable housing either generally or locally, one cautioning that 35% affordable housing would change the character of the retirement and heritage tourist area and that ‘social engineering would be at risk of destroying what makes Christchurch a desirable place to live’.

2.151 Two respondents expressed similar concerns about the consequences for their neighbourhood (Verwood) and risks to its social balance. The wisdom of providing a high percentage of affordable housing in Verwood was specifically questioned when the town has little to offer in the way of job opportunities.

2.152 Response

2.153 The clear majority of respondents supported LN9 and of those opposing, only three provided a justification. However none of the written arguments were made on technical grounds or were supported by evidence. Nor were examples given of ways in which current affordable housing policies operated by both Councils have resulted in adverse social or economic consequences.

2.154 In light of comments made it would appear that some of the respondents were confused by the difference between affordable housing targets (LN9 & LN10) and the minimum affordable housing requirement on qualifying sites (LN11). The target is less than the requirement because it is assumed that some sites will not be able to deliver affordable housing, due to viability.

2.155 A key national housing objective is to create sustainable, inclusive and mixed communities. The Core Strategy develops this through policies on housing mix and type (Options LN1 - 4), and affordable housing. This objective applies both to existing areas which may currently lack a genuine mix of housing types and tenure and to new communities which emerge through the planning of new neighbourhoods. Some housing areas, such as Verwood, may be less well connected to employment areas but there is still a need to provide opportunities for affordable housing to meet local needs.

2.156 Non Preferred Option LN10 Supporting comments

2.157 Of twenty two responses to LN10, twenty explicitly supported the policy option, including West Parley Parish Council, who did not provide any comments. Supporting comments were:- the present economic climate making the importance of affordable and social housing greater than ever and the only way that housing in the green belt is supported would be because of the exceptional circumstances of meeting the need for affordable housing.

2.158 Non Preferred Option LN10 Objecting comments.

2.159 2 Objectors considered that the target was too high being either unrealistic (St Leonards & St Ives Parish Plan Group) or that it should be less than 35%.

2.160 Response

2.161 Although two objectors were opposed to the option on the basis that a 40% target was either unrealistic or should be lower, no supporting evidence was given. Nor did the objectors express opposition to the principle of setting a target – only that 40% was not achievable.

Consideration of Evidence and Policy

2.162 PPS3 Housing (revised June 2011) states in para 29 that Local Planning Authorities should set an overall (i.e. Plan-wide) target for the amount of affordable housing to be provided in a plan period. It should reflect an assessment of the likely economic viability of land for housing within the area, taking into account risks to delivery and drawing on informed assessments of likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.

2.163 The results of the **Three Dragons Viability Study** indicate that there is a case in Christchurch to apply a 40% affordable housing requirement on qualifying sites. The same applies in East Dorset, although in some low market areas where a scheme involves demolition the requirement may have to be lowered to ensure that the scheme remains viable. This recommendation applies to individual sites and not to an overall target.

2.164 The **Draft National Planning Policy Framework (NPPF) 2011** maintains the key role played by Strategic Housing Market Assessments (SHMAs) in paragraph 28 and states that Local Plans should meet the full requirements for market and affordable housing in the housing market area (paragraph 109). When adopted, the NPPF will replace all of the Planning Policy Statements including PPS3 and its Affordable Housing requirements (including the requirement for an 'Affordable Housing Target', paragraph 29).

2.165 The NPPF, when adopted, will therefore remove the requirement for local planning authorities to include an affordable housing target within the context of LN9 & LN10 but will replace it with a requirement to meet the 'full requirements for market and affordable housing'

2.166 Bournemouth Poole Housing Market Area 2011 Strategic Housing Market Assessment Update

2.167 SHMA Update Reports for Christchurch and East Dorset have provided both Councils with evidence of the changing local housing market over the past four years where average local values have fallen between 4.8% and 9.4%. Unsurprisingly the volume of sales during 2010/11 had fallen by approximately 50% from its ten year peak in 2006/7 (CLG Live Tables).

2.168 Over the past four years 31.9% of all new build completions in Christchurch have been affordable homes, whilst only 5.5% have been affordable in East Dorset.

2.169 With no immediate signs of recovery in the housing market; ongoing issues around viability and increasing expectation that local authorities should be willing to renegotiate existing S106 agreements, there is a need for any target to be realistic.

'Options for Consideration' Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN9	Non Preferred Option LN10
8: Suitable and affordable housing	Strong Positive Impact	Strong Positive Impact
12: Sustainable economic growth	Strong Positive Impact	Strong Positive Impact

Table 2.16

2.170 Both options provide significant positive benefits on housing and economic objectives. However, further analysis identifies that the higher level of affordable housing contribution required in the Option LN10 target could reduce the scope for development to support infrastructure requirements.

‘Options for Consideration’ Habitats Regulations Assessment

2.171 The Habitats Regulations Assessment concluded that Options LN9 and LN10 are not likely to have a significant effect on European sites as the options themselves would not lead to development: instead they relate to criteria for development i.e. the proportion of affordable homes to be provided within overall housing development, the effects of which are assessed under other policies.

‘Options for Consideration’ Health Impact Assessment

2.172 The Health Impact Assessment assessment did not identify any adverse impact but identified a positive impact on housing objectives.

‘Options for Consideration’ Equalities Impact Assessment

2.173 The Equalities Impact Assessment identified positive impacts on age and disability groups, people living in rural isolation and areas of deprivation indicators. Young and older people and those with disabilities would benefit from the availability of more housing to meet their needs. The options may also provide for those in areas of deprivation by providing more housing to meet their needs.

Infrastructure Requirements

2.174 This policy does not give rise to infrastructure requirements.

Conclusions

2.175 The value of retaining an affordable housing target for the plan area is that it defines a longer term strategic commitment to maximising affordable housing completions and that the Council will monitor progress. A long term target also creates a justification for permitting flexible measures to overcome short-term viability problems but to expect upward adjustments when market conditions improve.

2.176 Both LN9 and LN10 and their respective affordable housing targets of 35% and 40% were equally strongly supported through the consultation exercise. They also both score equally positively when assessed against the Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment objectives. However it is unlikely that 40% is achievable over the life of the Core Strategy even if the baseline affordable housing policy for greenfield sites was set at 50% (as proposed in Alternative Preferred Policy LN12). Even if LN12 were adopted, additional problems would be encountered in Christchurch as most sites in Borough are ‘brownfield’ i.e. only expected to provide 40%, and preliminary investigations into the Urban Extension have suggested that in present conditions, more than 35% affordable housing would not be viable.

2.177 On balance, given that an affordable housing target would play a supporting strategic and performance monitoring role, it is considered that LN9 continues to be the appropriate approach to take forward. It is suggested that the Councils' aim of 35% of new housing to be affordable would be best included within Key Strategy housing policy on the broad location and scale of new housing in Policy KS3 and KS4.

2.178 In conclusion, it is recommended that Policy KS3 and KS4 of the Pre Submission document be amended to add the following sentence at the end of each policy :- "The Council aims for a total of 35% of these new homes to be affordable as defined in Appendix 2".

Issue and Options Identified in 'Options for Consideration' Core Strategy:

What is an appropriate policy which will maximise the delivery of affordable housing policy to meet identified affordable housing needs?

Preferred Option LN 11

In order to maximise the delivery of affordable housing, the Councils will require:

All residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

A financial contribution provided by the developer will be acceptable in the following situation:

- Sites of under 5 units where, for practical reasons, it is not possible to provide units on site.

On sites of 5 or more dwellings provision should be on-site, but off-site provision on an alternative site, may be acceptable in the following situations:

- Where off-site provision would better meet priority needs.
- To provide a better distribution of social units throughout the districts.

If an alternative site is not available, a financial contribution in lieu of provision may be accepted. Financial contributions should be of broadly equivalent value to on-site provision.

Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need.

The mix of units should reflect local housing needs identified in the latest Strategic Housing Market Assessment (see Preferred Option LN 1).

In East Dorset the tenure split should normally allow for 15% intermediate housing, with the remainder being social rented. In Christchurch the split should normally be 90% social rented and 10% intermediate housing where appropriate unless specific local circumstances would dictate otherwise. Variation of this requirement must be clearly justified in relation to meeting the needs of the District. If intermediate housing cannot be provided for financial reasons the affordable housing should be social rented.

Any planning application which on financial viability grounds proposes a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

Alternative Preferred Option LN 12

As option LN11, but the affordable housing requirement on new greenfield housing sites to be 50% subject to feasibility and viability.

Non Preferred Option LN 13

As option LN11, but to have a threshold of 5 units for provision of on-site affordable housing and not request financial contributions from sites of 1 – 4 units.

Non Preferred Option LN 14

As option LN11, but the affordable housing tenure split to be 70% social rented and 30% intermediate.

Alternative Preferred Option LN 15

As option LN11, but no recommended tenure split.

Consultation Response

Option	Support	Object	No Opinion	Total
LN11	22	14	0	36
LN12	3	2	0	5
LN13	18	1	0	19
LN14	0	1	0	1

Option	Support	Object	No Opinion	Total
LN15	0	1	0	1

Table 2.17

Key Comments on LN11 - LN15

2.179 Preferred Option LN11: Supporting Comments

2.180 Of thirty six responses to LN11 twenty two supported the option including West Parley Parish Council, Corfe Mullen Parish Council, Cranborne & Edmondsham Parish Council and Cranborne Estate. Comments included:-

- Support flexibility within the policy and use of viability tests (Corfe Mullen Parish Council).
- Support in principle but financial contribution alternative for sites of 5 or less must be directed back to the parish or town where original development took place (Cranborne & Edmondsham Parish Council).
- Support in principle but financial contribution alternative for sites of 5 or less must be kept locally and enable developer where possible to influence where it is spent (Cranborne Estate).
- Support as importance of affordable housing greater in the present economic climate.
- Support policy which would raise financial contributions from sites of under 5 units.

2.181 Preferred Option LN11: Objecting comments

2.182 4 objectors objected to the principle of affordable housing, expressing concerns about the consequences for Verwood, Wimborne and Colehill. They raised similar issues to those raised in objections to Option LN9, highlighting adverse impacts of affordable housing generally.

2.183 Other objecting comments were:-

- 5 respondents - Jackson Planning, Tetlow King, Woolf Bond Planning, Turley Associates and Savills objected to the defined tenure splits stating that the proportions proposed would not be deliverable and that an insistence on social rent would prevent market recovery. A flexible approach would be necessary to keep with national guidelines.
- 4 respondents - Jackson Planning, Tetlow King, Southern Planning Practice, St Leonards & St Ives Parish Plan Group - objected to the intended approach to thresholds and that every development makes a contribution. The approach would stop smaller schemes coming forward. Reference was made to the failed Bournemouth experience.
- 1 objected to proposals to secure affordable housing 'in perpetuity'
- 1 objected to the requirement for evidence to prove viability – this would add costs and delay (Southern Planning Practice)

- 1 objected to setting of minimum requirement of 40% and suggested expressing it as a target instead (Terence O'Rourke)
- Detail required on definition of affordable housing, how it will be subsidised and housing types.

2.184 Response

2.185 Although there is a need to review and revise some of the detail, LN11 sets out a clear position reflecting current guidance and it builds on past experience. Despite comments to the contrary, the proposed wording does include scope for flexibility and allows for viability adjustments. It is also right that the affordable housing provision is a requirement and not a target – a target in this context would create ambiguity and uncertainty and lead to ongoing challenges.

2.186 However, the respondents raise a number of points and opinions concerning detail and delivery that need to be carefully reconsidered. Some elements should be reviewed in light of the updated Strategic Housing Market Assessment report whilst others need revisiting due to emerging housing policy.

2.187 Key areas for review include tenure proportions and ensuring that the proposed approach to thresholds, financial contributions and viability are clearly defined and supported by procedures that will work in practise. Associated triggers and processes must be robust, fair and transparent and not impede short or long term development delivery.

2.188 Alternative Preferred Option LN12: Supporting Comments

2.189 Three respondents supported LN12 including Synergy Housing to maximise the potential for affordable housing provision, however two commented that they would object to large Green Belt sites being developed.

2.190 Alternative Preferred Option LN12: Objecting Comments

2.191 Two respondents objected for the following reasons:-

- It should not be imposed in this arbitrary fashion (St Leonards & St Ives Parish Plan)
- Affordable housing contributions need to be balanced with other demands on a site. A 40% target would be more acceptable if expressed as a target rather than minimum (Banner Homes)

2.192 Response

2.193 Despite being given equal 'Alternative' Preferred status to LN11, it is noteworthy that LN12 generated very few responses, either supporting or opposing a higher 50% threshold for Greenfield Sites.

2.194 Although this suggests that respondents chose to support LN11 in preference to LN12, this is an interpretation and cannot be considered a robust conclusion given the form and presentation of the consultation document and the consultation process itself. The fact that only five respondents chose to address the option could equally suggest that insufficient importance was awarded to the Option as an 'Alternative'. Its status and merits may have been underestimated and overlooked

2.195 Non Preferred Option LN13: Comments

2.196 19 of the 20 respondents supported the option as proposed, making no comments. The single objector reiterated a previous response not directly related to LN13

2.197 The level of support for LN13 highlights the sensitivity surrounding this aspect of the proposed policy and the potential risks of expecting every development to make an affordable housing contribution, albeit subject to viability. And if Preferred Option LN11 is to be taken forward, then from the outset, it must be supported by defined, transparent and swift viability decision making procedures capable of fitting all types of planning application.

2.198 Non Preferred Option LN14: Comments

2.199 Only one response was received, objecting to LN14 due to the move to Affordable Rent from Social Rent (Synergy Housing).

2.200 Objections to the proposed tenure split recorded under Option LN11 cited reasons as the proportions proposed would not be deliverable and that an insistence on social rent would prevent market recovery. A flexible approach would be necessary to keep with national guidelines.

2.201 Response

2.202 Despite the number of objections to the proposed tenure split in LN11, it is concerning to note that LN14 did not generate a higher response rate. As per the response rate to Alternative Option LN12, this makes interpretation difficult, as low response levels may imply confusion around the consultation literature rather than an expression of support or objection.

2.203 This Option also highlights the need to realign the main policy wording to the provision of secure Affordable Rented housing rather than references to 'social rent'

2.204 Non Preferred Option LN15: Comments

2.205 Only one response was received, objecting to a 40% requirement but welcoming the removal of a fixed tenure split (Banner Homes).

2.206 Response

2.207 In line with observations made under LN14 regarding tenure split, the poor response rate to this Non-Preferred Option is confusing, given the level of objection to the tenure split suggested within LN11.

Consideration of Evidence and Policy

2.208 Planning Policy Statement 3 (PPS3)

2.209 PPS3 was revised in July 2011 to include a new form of affordable housing tenure “Affordable Rent” that will be set at no more than 80% of market rent (to include service charges) as determined using Royal Institute of Chartered Surveyors approved methodology. The model now sits alongside “Social Rent” as a form of secure housing, however, it is expected to include a shorter fixed-term tenancy period in the region of 5 years.

2.210 With approved planning status, and a reduced requirement for subsidy, the new model is expected to replace the role previously played by ‘social rent’ as the main form of affordable housing for those in greatest need. However, the model is still experimental making it prudent for emerging planning policy to be flexible, capable of reverting to social rent or any other changes that may arise in the future.

2.211 Draft National Planning Policy Framework (NPPF) 2011

2.212 Although the draft NPPF maintains the importance of affordable housing and the expectation that Local Planning Authorities will adopt appropriate policies to secure its provision, it does so in outline removing much of the detail previously associated with PPS3.

2.213 Some key elements have been deleted (for example the requirement to set percentages of affordable housing, tenure splits and guidance on setting thresholds) whilst others have been broadened and made less prescriptive. However a duty will remain to identify and meet housing needs (both market and affordable) and where Planning Policies are adopted they should be based upon relevant and broad based evidence, that take viability and local circumstances into account (including housing affordability).

2.214 The Impact Assessment of the NPPF states that the document’s silence around thresholds is intentional – Local Planning Authorities have been given the freedom to assess and set their own thresholds to suit local circumstances

2.215 The role and importance of Strategic Housing Market Assessments is highlighted as the evidence base to inform the mix and range of tenures.

2.216 Significantly the draft NPPF asserts that affordable housing needs should be met on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 111).

2.217 The Localism Act

2.218 The Act does not directly impact on the issues raised within LN11 to LN15 however its reforms to social housing reflect the Coalition Government’s broad commitment to enabling local policy setting that is better aligned with local priorities rather than national policy objectives; a direction of travel giving added emphasis for local planning policy to prioritise affordable housing to meet local (i.e. District or Borough) need.

2.219 Strategic Housing Market Assessment Update 2011

2.220 The updated Strategic Housing Market Assessment has confirmed that housing need in both Christchurch and East Dorset remains at a high level. In absolute terms the annual shortfall of affordable housing in Christchurch has increased from 243 per annum in 2007 to 332 in 2011; at 426 per annum East Dorset remains close to its previous figure of 440.

2.221 In more realistic terms reflecting predicted household growth, the Strategic Housing Market Assessment suggests a total housing requirement of 6,700 new homes in East Dorset and 4,371 in Christchurch over a 20 year period. If 40% of all housing delivery is affordable housing delivery these requirements will result in 134 homes in East Dorset and 87 in Christchurch, per annum.

2.222 Given the level of need and each Local Authority's wider housing obligations, Planning Policy objectives should continue to prioritise affordable housing for the most vulnerable, however evidence from the updated Strategic Housing Market Assessment confirms that a wider tenure split than previously considered would still be appropriate. When absolute needs are set against realistic completion rates, the research concludes that the balance of Affordable Rented and other types of Intermediate Housing could be flexible and target setting should be a matter for local discretion.

2.223 In addition to providing more affordable homes for those in lower paid employment, a greater diversity of tenures would increase the scope for mixed communities as well as improving development viability and therefore more affordable homes. Although proportions of tenure will need to be very carefully considered with an overarching target, the introduction of Affordable Rent (at 80% of market rates) has diminished the priority previously associated with the social imperatives of social rented housing.

2.224 The Strategic Housing Market Assessment update also highlighted the role played by Intermediate Affordable Housing products and the opportunity for Councils and Developers to work together on new models to overcome current restrictions imposed by saving for deposits and mortgage lending. Core Strategy Policy will need to be sufficiently flexible to incorporate any new models as these develop.

2.225 In terms of the size of housing required, the reports for both Councils concluded that around 55% of market housing (over the plan period) should be larger, i.e. 3 and 4 bedrooms. Whilst 60%-70% of housing in the affordable sector should be smaller, i.e. 1 and 2 bedroom with the main focus being on two bedroom accommodation.

2.226 Housing Market implications

2.227 Affordable housing planning policies should seek to maximise provision over the life of the Core Strategy, however they must not inhibit the meeting of wider strategic development objectives including the provision of housing and/or economic growth.

2.228 Since the draft Core Strategy was published, and to help facilitate recovery in the wider housing market, local planning authorities have been urged to review existing affordable housing requirements pragmatically (where these are inhibiting development) and to ensure that new eligible development proposals allow for flexibility whilst providing certainty and clarity. Emerging affordable housing policies must equally reflect these principles in a form that combines ambitious delivery requirements over the life of the Core Strategy with flexibility and the ability to incorporate new models and methods of delivery as they emerge.

2.229 Both nationally and locally, increased emphasis is being placed on the consequences of the housing market for those in work and lower paid employment who support local communities and economies but cannot afford to buy or rent. In Christchurch and East Dorset the situation is particularly acute given the high costs of buying and renting, the significantly lower than average levels of affordable housing and the lack of available privately rented accommodation

‘Options for Consideration’ Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN11	Alternative Preferred Option LN12	Non Preferred Option LN13	Non Preferred Option LN14	Non Preferred Option LN15
8: Suitable and affordable housing	Strong Positive Impact	Strong Positive Impact	Strong Positive Impact	Strong Positive Impact	Strong Positive Impact
12: Sustainable economic growth	Positive Impact	Positive Impact	Positive Impact	Positive Impact	Positive Impact

Table 2.18

2.230 All options score equally well under the Sustainability Appraisal, except that analysis reveals that Option LN15 (no recommended tenure split) could result in a negative impact on housing objectives if inappropriate tenure mixes are proposed that do not meet housing needs. Also increased contributions to affordable housing could have an impact on wider infrastructure planning.

‘Options for Consideration’ Habitats Regulations Assessment

2.231 The Habitats Regulations Assessment concluded that Options LN9 and LN10 are not likely to have a significant effect on European sites as the options themselves would not lead to development: instead they relate to criteria for development i.e. the proportion of affordable homes to be provided within overall housing development, the effects of which are assessed under other policies.

‘Options for Consideration’ Health Impact Assessment

2.232 The Health Impact Assessment did not identify any adverse impacts on health objectives.

‘Options for Consideration’ Equalities Impact Assessment

2.233 The Equalities Impact Assessment did not identify any negative impacts of these options. Young and older people and those with disabilities would benefit from the availability of more housing to meet their needs. The options may also provide for those in areas of deprivation by providing more housing to meet their needs.

Infrastructure Requirements

2.234 This policy does not give rise to infrastructure requirements.

Conclusions

2.235 Over the past 12 months many of the issues at the centre of national debates on social, economic and environmental policy have had links to affordable housing either directly or indirectly: the housing market and economic recovery, public spending, housing benefit, localism, the loss of Green Belt, reliance on the private sector, the National Planning Policy Framework, lending and borrowing – all include facets that will make future delivery either more or less likely to happen.

2.236 Whilst these factors and the changing context needs to be taken into account, the Councils affordable housing policies must also be capable of standing fast throughout future changes and being ‘fit for purpose’ for the next 15 years. It has therefore been necessary to carefully reconsider all five of the options and to reflect on the observations of respondents.

2.237 Although the wider policy and operational context is still developing, it will be essential for the new policy to tackle as many of the uncertainties and issues as possible. As written, some aspects of LN11 already need to be reviewed and whilst the headline principles remain appropriate, the policy will not fully achieve long term maximisation – an aspiration that will need to be carefully balanced with delivery considerations and the need for supporting guidance implemented at the same time as the Core Strategy.

- Given that Core Strategy Policies are required to meet a 15 year timeline (well beyond the current recession); that housing objectives are driven by the need to maximise affordable housing delivery; that greenfield sites in the area are likely to have high land values, it is considered that Alternative Option LN12 should be implemented (50% affordable housing) and will be deliverable given that current and future development proposals will require economic viability assessments. However there is a need to refer to viability work undertaken for our new neighbourhood areas and allow for exceptions. The policy should refer to "50% unless otherwise stated in strategic allocations". Other development proposals (brownfield sites) will be required to provide 40% affordable housing.
- It is considered that LN11 continues to provide the most appropriate approach to thresholds and the expectation that all housing development should make a contribution to affordable housing, subject to viability. However it is accepted that affordable housing cannot be provided on some developments, both small and large scale. Under these conditions, and only under these conditions, should options other than on-site provision be considered.
- The vagaries of alternative options that “better meet priority needs” or that enable a “better distribution of social units” should be removed. (not least to remove the emphasis on ‘social units’)
- The proposed policy should explicitly state that affordable housing is required for those in housing need and with a Local Connection.

- The Council should express its recognition that the affordable housing mix will be subject to negotiation but only within parameters defined by the Strategic Housing Market Assessment.
- Tenure split proposals should be revised to achieve a reasonable balance between affordable rented/social rented housing (for those in greatest need) and intermediate affordable housing (for those in lower need and/or in lower paid employment). 70/30 is a well-established norm that strikes the balance between meeting priorities but also achieving viability and optimising delivery: it has been widely applied locally and regionally where supported by housing need. Given the likely local scale of delivery, up to 52% of affordable housing in Christchurch could be Intermediate and up to 70% in East Dorset, whilst still meeting housing need. At 30% Intermediate a significant contribution is being made to those in lower need but over twice as much affordable housing will be provided for those in higher need. The proposed tenure split also allows for further negotiation to accommodate failed viability (i.e. the Councils may have the choice of reducing the overall percentage of affordable housing, or, accepting a high proportion of Intermediate Affordable Housing).

2.238 Outside the main policy the Council needs to develop mechanisms that enable in-built viability reviews in connection with larger developments, especially where these involve phased or delayed delivery.

2.239 Given the intention to maximise affordable housing delivery but to apply an approach that is fair, balanced and transparent, the Councils will need to adopt defined procedures in connection with viability appraisal, in terms of process and methodology. In light of Bournemouth's recent difficulties implementing and then being forced to revise their Affordable Housing Supplementary Planning Document, it will be essential to adopt swift and conclusive protocols in this respect. In the same vein, the Council must provide clarity in Core Strategy text (or an Supplementary Planning Document) concerning the intended approach to less than whole units of affordable housing (for either commuted sums or onsite delivery) and formulas for calculating off-site commuted contributions, where these are accepted.

2.240 In conclusion, taking into account national policy changes, updated evidence and the results of consultation, it is recommended that the Option LN11 is an appropriate approach to take forward for an affordable housing policy, subject to the following amendments:-

2.241 In order to maximise the delivery of affordable housing the Councils will require:

2.242 All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

2.243 A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.

2.244 On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site off-site provision on an alternative site may be acceptable.

2.245 If an alternative site is not available, a financial contribution in lieu of provision may be accepted.

2.246 Financial contributions should be of equivalent value to on-site provision.

2.247 Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a Local Connection.

2.248 The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment (see Preferred Option LN1). Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

2.249 Any planning application which on financial viability grounds proposed a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

Issue and Options Identified in 'Options for Consideration' Core Strategy:

Should the core strategy develop an affordable housing rural and urban exceptions policy?

Preferred Option LN 16

Exceptionally, land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development, may be developed in order to provide affordable housing in perpetuity provided that;

- The housing comprises 100% affordable housing
- The housing is to meet local needs, defined as being within the Parish/Town, or neighbouring Parish/Town.
- The proposed development would provide a mix of housing size and type which meets the local needs identified in the Strategic Housing Market Area (see Preferred Option LN 1)
- The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape
- The development is well related to community facilities and services

This option will apply to the following settlements:

East Dorset:

- Colehill
- West Moors
- St Leonards and St Ives
- Three Legged Cross
- Alderholt
- Cranborne
- Furzehill
- Gaunt's Common
- Gussage St Michael
- Gussage All Saints
- Hinton Martell
- Holt
- Horton
- Longham
- Shapwick
- Sixpenny Handley
- Sturminster Marshall
- Wimborne St Giles

- Witchampton
- Woodlands

Christchurch:

- Burton
- Winkton
- Land adjoining the built up area of Christchurch

Alternative Preferred Option LN 17

To have no exceptions policy for urban areas.

Consultation Response

Option	Support	Object	No Opinion	Total
LN16	13	10	0	23
LN17	0	0	0	0

Table 2.19

2.250 Option LN6 Supporting Comments

2.251 Option LN16 had majority support. 13 respondents supported the policy including Corfe Mullen Parish Council, Synergy Housing, Cranborne & Edmondsham Parish Council, West Parley Parish Council, Cranborne Estate, Highways Agency, Cranborne Chase & West Wiltshire Downs AONB, Environment Theme Action Group (East Dorset) and Jackson Planning on behalf of Meyrick Estate Management. Comments from those supporting the policy were:-

- Support provided 100% affordable housing and there were local facilities available for the population to increase;

- Corfe Mullen should be included in list of areas suitable for exception sites to allow for the possibility of future opportunities (Corfe Mullen Parish Council)
- Support with the ability of the developer/landowner to retain an element of nomination rights and needs based truly on local needs (Cranborne Estate)
- Support but expect proposals to be small scale. The Agency would be concerned if any significant housing proposals located close to the Strategic Road Network (Highways Agency)
- Support providing Parish / Town council in agreement and backed by a reasonable percentage of residents.
- Support if genuinely provided homes for local people and especially if their release brought forward land for playing fields and allotments (reflecting views expressed at public meeting in Sturminster Marshall)
- Support but concerned that policy could apply to significant number of villages within AONB and sites outside development boundary unsustainable and inaccessible to those without private transport (Cranborne Chase & West Wiltshire Downs AONB)
- Support identification of Burton and Winkton but policy should reflect new mechanisms to achieve affordable housing. Likely that open market housing required to cross subsidise affordable housing, following almost complete removal of Homes and Communities Agency grants (Jackson Planning Ltd on behalf of Meyrick Estate Management)

2.252 Option LN17 Objecting Comments

2.253 There were 13 respondents registering an objection to Option LN16, including Alderholt Parish Council, Holt Parish Council, Vale of Allen Parish Council, Dorset Wildlife Trust, St Leonards & St Ives Parish Plan Group and Tetlow King. The majority did not appear to be opposed to the principle of exception site policy but sought revisions to the detail. Comments were:-

- Object to definition of local needs in bullet point 2. Affordable housing should be occupied by people with a proven local connection to the parish (Alderholt Parish Council)
- Holt should be removed from the list as local need has not been clearly demonstrated and Holt does not have community facilities and services. (Holt Parish Council)
- Opening sentence suggests that Green Belt status can be ignored.
- Burton and Somerford (Grange Ward) already have a lot of social housing.
- Settlements without community facilities and services should not have exception sites imposed. Hinton Martell should be removed from the list (Vale of Allen Parish Council)
- Policy should not apply where sites are already protected under policies ME1 and ME3 (Dorset Wildlife Trust)
- St Leonards Hospital could be a potential site (St Leonards & St Ives Parish Plan Group)
- Support in principle but consider it should be re-worded to make it effective e.g. may need to allow for sites not immediately adjoining settlement boundary, cross subsidy from general market housing and more definitions included. (Tetlow King).

2.254 Response

2.255 A minority of respondents objected to the policy in general. Whilst others questioned certain aspects and details, the policy proposal was well supported.

2.256 Given the nature and sensitivity of exception site development, policies require prescriptive wording and a definitive list of eligible settlements. In reaching the preferred wording, the Councils have carefully considered the appropriateness and sustainability of the listed settlements and included a degree of flexibility. However, some of the issues raised by objectors need to be reconsidered in light of local experience in the past 12 months and emerging policy proposals at a national level. This is contained in the Consideration of Evidence and Policy section below.

2.257 Non Preferred Option LN17 Comments

2.258 No comments were received in response to Option LN17. With a significant level of support for Preferred Option LN16 - and no associated comments therein – it can be concluded that respondents support the principle of exception site policy applying to both urban and rural areas.

Consideration of Evidence and Policy

2.259 PPS 3 allows for the allocation and release of sites solely for affordable housing to meet local needs in perpetuity using a rural exception site policy. This enables small sites to be developed for affordable housing in small rural communities that would not normally be released for housing because they are subject to restraint policies - e.g. Green Belt.

2.260 Draft National Planning Policy Framework (NPPF) 2011

2.261 The draft NPPF is focused on making communities stronger and more viable, both rural and urban. This includes an emphasis on planning for local housing requirements, particularly affordable housing.

2.262 Although the document provides no explicit direction on the provision of exception site policy, paragraph 112 notes that local planning authorities should consider whether allowing some market housing (in rural areas) would facilitate the provision of significant affordable housing to meet local need. The association with exception site policy is implied although other significant sources of guidance make the link more explicitly (advice on the NPPF by the Planning Inspectorate). However to ensure development is sustainable the NPPF states that rural housing distant from local services should not be allowed.

2.263 The Localism Act

2.264 The Localism Act empowers and encourages community involvement in a number of areas including the provision of affordable housing but it makes no direct connection to current or future exception site policy. However, through Community Right to Build - part of Neighbourhood Planning - a route will enable Communities and Parishes to advance development proposals without a traditional planning application where these meet minimum criteria and are supported through a referendum. It is too early to predict the likely success and take-up of this innovation but it may offer an alternative route for the delivery of affordable housing in the future, that is closely aligned with exception site principles.

2.265 Strategic Housing Market Assessment (SHMA)

2.266 In addition to the headline affordable housing shortfall (see LN11) it is noteworthy that the more detailed analysis of East Dorset confirms that 13% (55 units per annum) stems from rural areas.

2.267 Applying the consultants housing market model results in a total requirement 25 units per annum in rural areas (40% affordable and 60% market). A conclusion that supports the merits of a new policy option (for appropriate and sustainable rural settlements) permitting the limited development of market housing to cross subsidise affordable housing delivery for community benefit.

2.268 Although Preferred Option LN16 refers to the Strategic Housing Market Assessment as the means to identify local needs, this is an unrealistic expectation. Whilst the Strategic Housing Market Assessment provides a reliable evidence base to inform district wide requirements and general housing need in larger settlements, it is unlikely to provide a sufficiently robust level of evidence to support individual rural exception site proposals. Local research will continue to be necessary supported by the Strategic Housing Market Assessment and other available sources of housing need evidence.

2.269 Newly arising factors and influences

2.270 Exception site policy has existed since the 1980's and has provided a valuable, albeit small scale, means of delivering affordable housing in rural areas.

2.271 As proposed the policy would provide a new option to deliver affordable housing in Christchurch, however, a policy already exists in East Dorset; an exception site scheme completed in Summer 2011 (Hinton Martell) whilst a newly proposed development was approved by the District's Planning Committee in November 2011 (Holt).

2.272 Processes associated with both schemes have highlighted the complexity and sensitivity surrounding exception site policy and the need for an approach that is sufficiently robust to ensure that occupation will be strictly controlled but also flexible enough to accommodate the needs of Providers and Lenders.

'Options for Consideration' Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN16	Alternative Option LN17
8: Suitable and affordable housing	Strong Positive Impact	Positive Impact
11: Local distinctiveness	Uncertain Impact	No impact
12: Sustainable economic growth	Strong Positive Impact	Positive Impact

Table 2.20

2.273 Option LN16 records a more positive impact on housing and economic objectives as it broadens policy to apply to urban as well as rural settlements, resulting in more opportunities for the delivery of affordable housing than Option LN17. However, an uncertain impact on objective 11 for Option LN16 is identified as introducing an urban exceptions policy could have an uncertain impact on protecting the countryside from suburbanisation.

‘Options for Consideration’ Habitats Regulations Assessment

2.274 The Habitats Regulations Assessment concluded that it was not possible to assess whether Option LN16 is likely to have significant effects on European sites as this policy option may result in development on land otherwise considered inappropriate for development. There is potential for indirect significant effects including from visitor pressure and increased levels of emissions. The Habitats Regulations Assessment identifies a range of mitigation measures such as best practice construction techniques and provision of Suitable Alternative Natural Greenspaces alongside new development. Further measures to relieve pressure are also likely to be implemented through the emerging Heathlands Joint Development Plan Document and SE Dorset Green Infrastructure Strategy. The Core Strategy also sets out policies which seek to restrict emissions from transport and energy generation, and minimise water usage within new developments (Objective 3; Objective 6; KS19; KS20 and ME7. The Habitats Regulations Assessment concluded that Option LN17 is not likely to have any significant effects on European sites as this option would not in itself lead to development.

‘Options for Consideration’ Health Impact Assessment

2.275 The Health Impact Assessment identified mainly neutral impacts on health objectives but identified a positive impact on the housing objective. However a negative impact on natural environment was recorded as both options promote exceptions site development for affordable housing within Green Belt sites.

‘Options for Consideration’ Equalities Impact Assessment

2.276 The Equalities Impact Assessment identifies positive impacts on age and disability groups and those in rural isolation. These options would in particular benefit those in housing need in the rural area. The young and older people and those with disabilities would benefit from this policy.

Infrastructure Requirements

2.277 This policy does not give rise to infrastructure requirements.

Conclusions

2.278 Option LN16 has received majority support whereas LN17 has not attracted any support or objections. It can be concluded that respondents support the principle of an exception policy applying to both rural and urban areas. Also Option LN16 would result in more positive impacts on sustainability criteria as it offers a more significant increase in opportunities for the delivery of more affordable housing. The policy approach in LN16 accords with existing and emerging national policy and local evidence. Respondents have raised a number of issues concerning the detail of the policy, which have been considered, and in some cases will result in suggested revisions to the policy wording.

2.279 In conclusion it is considered that Preferred Option LN16 is an appropriate approach to take forward to Pre-Submission stage, subject to the following revisions:-

- Insert the following new bullet point "Secure arrangements are included to ensure that its benefits will be enjoyed by successive as well as initial occupiers"
- The second bullet point should be deleted and the third amended to include "demonstrated local housing needs"
- The fifth bullet point to be deleted as there is a conclusive list of acceptable parishes / communities so the test of development being well related to community facilities and services has already been met.

Issue and Options Identified in 'Options for Consideration' Core Strategy:

How and where can facilities and services be provided to support the existing population and meet the needs of a growing population and changing age profile?

Preferred Option LN 18

Facilities and services will be provided to support the existing population as well as the growth in population and changes in the age profile by the following:

New facilities should be concentrated in the urban areas of Christchurch, Highcliffe, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. This is where access can be by public transport, bike and foot. Some facilities could be provided in smaller settlements with innovative ways of providing services, such as taking services to the smaller settlements and in the case of the health service, into homes, which would make more use of existing facilities. More innovative ways of providing services would be relevant in the suburban areas of both East Dorset and Christchurch where access to facilities is more restricted to the car.

The Council will work with partners and providers of services to ensure the timely provision of high quality, convenient and local facilities and services such as education, health, library, youth services, older persons requirements and community buildings using the current County Council work as a basis once this is available.

Loss of facilities will be resisted unless it is shown that the facility is unused and no longer needed.

The Council will work with partners and providers to ensure the timely and adequate provision of high quality, convenient, local and accessible facilities for community and cultural use, health and care, older people, children and young people.

Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services.

New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities.

New provision must be accessible to all.

Consultation Response

Option	Support	Object	No Opinion	Total
LN18	13	2	0	15

Table 2.21

2.280 The comments fall mainly between 3 categories - on the urban areas named in the policy/lack of reference to rural areas, on the shared use of facilities and on the need for various services and facilities

2.281 Urban areas referred to in second paragraph of policy/lack of reference to rural areas

- Support concept of maintaining village facilities but concerned that Cranborne and Sixpenny Handley are referred to as "urban areas" in the policy. They are significant villages within the AONB, but consider it inappropriate to describe them as urban areas in the same sense as Christchurch, Wimborne Minster, Colehill and Ferndown (Cranborne Chase & West Wiltshire Downs AONB)
- Policy LN18 needs to reflect the settlement hierarchy. If Burton is included as a third tier settlement, it should be included in the list of settlements that will improve services and facilities. There should be an allocation of a site for new housing in Burton. This will facilitate solutions to issues raised by Burton Parish Council including affordable housing provision, provision of a village hall access to countryside recreation. (Meyrick Estate Management)
- The way these ideas will be translated into meaningful support for those more rural deprived areas is not made clear. These communities need support now. Our rural areas have fewer people than areas proposed for development and their needs tend to be overlooked in favour of the majority. (Environment Theme Action Group, East Dorset)

2.282 Response

2.283 The policy needs to reflect the settlement hierarchy, which is addressed in the Key Strategy (Policy KS1 of the Pre Submission Core Strategy). The locations listed in Option LN18 fall within the first 4 categories of the settlement hierarchy as set out in Policy KS 1. It is agreed that they should not all be described as urban areas. The term "settlement" would be more appropriate. Although Burton is defined as a Village within the Policy KS 1 settlement hierarchy, in view of its size, it should be included within Option LN18 as an area where community facilities and services will be provided. Issues relating to a housing site at land to the south of Burton is considered in the Christchurch Urban Extension Background Paper and in Key Strategy Policy KS3 of the Core Strategy Pre Submission.

2.284 Multi-use or shared use of existing facilities

- Specifically support the concept of working with other public sector organisations to maximise the benefit of shared resources wherever possible. Plans to provide housing for families with young children will also impact. This is a key area where working with other public sector organisations to offer integrated facilities on a single site would be beneficial. (NHS Dorset)

2.285 Response

2.286 The support of the concept of shared working is welcomed. Partnership working is an essential element of this policy and will be required to ensure its delivery.

2.287 Comments on Need for Services and Facilities

- Education - there are complex questions relating to school capacity in East Dorset generally. A full appraisal of the need for school places and pyramid structure will be necessary once the level and distribution of new housing is known. (DCC Spatial Planning)
- Information in the Dorset Cultural Strategy 2009-2014 which includes research on provision of cultural amenities and a Citizens Panel Survey on access to culture may be of value in advancing the Core Strategy. (DCC Spatial Planning)
- Strategy should encompass youth friendly contraceptive clinics as there are none in this area. (DCC Youth Service)
- There is already significant space pressures on GP's in Wimborne, Verwood, West Moors and parts of Christchurch. Increasing housing stock as planned will bring additional requirements for health facilities. (NHS Dorset)
- An increasing elderly population is adding to pressure on hospital and homecare services particularly in relation to intermediate care beds in community hospitals in Wimborne and St Leonards and supporting people in their own homes (NHS Dorset). Good quality care for older people in their own homes should also be a priority. Wimborne Civic Society)
- Provision of housing for the elderly to include extra care housing would be welcomed alongside healthcare facilities for the elderly (NHS Dorset). More sheltered accommodation needed to prevent residents not being forced prematurely into care homes (Wimborne Civic Society). Policy only covers services for elderly, education and community facilities. It does not address the problem of the lack of specialist accommodation for the elderly in the district. (Tetlow King)
- Suggest policy amended to include or a separate policy included:- "The Council will seek to encourage the full range of care and accommodation solutions for the elderly. This will include, but will not be limited to: Extra Care housing, residential care homes, sheltered housing and Continuing Care Retirement Communities (Tetlow King)
- Clear provision should be made for places of worship for all denominations. Request that amend policy to include "places of worship" specifically along with community buildings. As our church halls are not hired out to any other organisation for other purposes, request the words "where appropriate" be added after "multi use of existing facilities". (Sandbourne Trust)

2.288 Response

2.289 The objective of Option LN18 policy is to support the provision of community facilities to meet the needs of a growing population and changing age profile. Comments from service providers and other respondents on the need for facilities have been noted and provide useful evidence. Partnership working on the identification of need and delivery of community facilities is essential. However it is not appropriate for the Core Strategy policy to provide detail on what types of community facilities/ services will be provided. The Core Strategy Infrastructure Delivery Plan sets out what services and facilities will be required to support the existing and future population on a strategic level. These have been identified in partnership with service providers and utility companies as set out in their Asset Management Plans and Business Plans. The reference in Option LN18 to the Council's work with partners (2nd and 4th paragraph) should affirm the importance of partnership working, although the two paragraphs overlap and could be combined into one paragraph.

2.290 There have been several comments on the issue of elderly persons' accommodation and care. The policy relates to the provision of community facilities and services, not housing. The need for specialist accommodation for the elderly has been raised as an issue under Options LN1 - 4 - housing size and mix

2.291 General Comment

- New community facilities should not have adverse environmental impacts. (RSPB)

2.292 Response

2.293 Policies in the Managing the Natural Environment chapter of the Core Strategy Pre-Submission document provide robust protection of the natural environment and will apply to proposals for new development.

2.294 Health and Community Issues Focus Group 22 November 2010

2.295 As part of the Core Strategy 'Options for Consideration' consultation a Health and Community Issues Focus Group was held to discuss the consultation options. The Focus Group comprised a wide range of representatives of health and community issues.

2.296 Relevant points raised in relation to Option LN18 included:

- Youth facilities needed in East Dorset. There is a lack of provision for young people in Alderholt.
- Youth facilities should be provided at existing places such as Tivoli and Regent Centre.
- Need to provide places which all age groups can use.
- GP's will be needed for residents in new developments.
- Community events which cut across ages would help and would create more community cohesion.
- Schools are developing a community cohesion policy which may help.

- Schools should be used for local facilities.
- Need to know how well existing facilities are used and promote more efficient use.

2.297 Meeting with Primary Care Trust 15 December 2010

2.298 As part of the Core Strategy 'Options for Considerations' consultation, a meeting with two representatives from the Primary Care Trust (PCT) was held to discuss the consultation options. Relevant points raised in relation to Option LN18 included:-

- In the future there may be a move towards flexible use of GP consulting rooms by other care providers outside consultation times.
- Co-location of related facilities is needed so it is easier to refer people to other facilities to help solve health related issues.
- GP's in both areas are full or close to being full. Developer contributions will be needed to provide for new or expanded GP surgeries for new housing and will need to be included within Community Infrastructure Levy
- The future of the Christchurch Hospital site is currently under discussion. There may be potential for further health facilities on part of this site.
- There is no location relationship between patients and dentists and no money for more dentists at present.

2.299 Response

2.300 The Focus Group discussion has drawn out the need for certain types of facilities and suggestions for alternative ways to provide them. The meeting with the Primary Care Trust has identified health care needs and issues within the health care service. As explained in the response section above to the comments on need for services and facilities, the issues raised will inform partnership working on the identification of needs and delivery of community facilities.

Consideration of Evidence and Policy

2.301 Many national reports and Planning Policy Statements recognise the importance of community and cultural facilities.

2.302 The draft National Planning Policy Framework (2011) retains this emphasis and para 126 states that "To deliver the facilities and services the local community needs, planning policies and decisions should:

- Plan positively for the provision and integration of community facilities (such as local shops, meeting places, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments
- Safeguard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day to day needs.
- Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable and retained for the benefit of the community".

2.303 The Core Strategy Infrastructure Delivery Plan sets out what services and facilities will be required to support the existing and future population on a strategic level. These have been identified in partnership with service providers and utility companies as set out in their Asset Management Plans and Business Plans.

2.304 Evidence obtained from service providers, organisations, community groups and individuals from meetings, focus groups and individual representations during the consultation period on the Core Strategy Options for consultation will also inform the identification of needs and delivery strategies for community and cultural facilities.

‘Options for Consideration’ Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN18
2: Sustainable use of resources	Strong Positive Impact
3: Minimise pollution	Strong Positive Impact
4: Climate change	Strong Positive Impact
5: Reduce the need to travel	Strong Positive Impact
7: Healthy lifestyles	Strong Positive Impact
9: Social cohesion and access to services	Strong Positive Impact

Table 2.22

2.305 The Sustainability Appraisal concluded that Option LN18 has a strong positive impact on objectives for sustainable use of resources, minimisation of pollution, climate change, reducing the need to travel, healthy lifestyles and social cohesion and access to services.

‘Options for Consideration’ Habitats Regulations Assessment

2.306 The Habitats Regulations Assessment concluded that it was not possible to assess whether Option LN18 is likely to have significant effects on European sites as this policy option may result in development of community facilities and services. Development should be focused in urban areas. However the likely impacts are uncertain without more information on the precise type and location of any development which may not be available until planning application stage. The Habitats Regulations Assessment identifies a range of mitigation measures such as best practice construction techniques and provision of SANGS alongside new development. Further measures to relieve pressure are also likely to be implemented through the emerging Heathlands Joint Development Plan Document and SE Dorset Green Infrastructure Strategy. The Core Strategy also sets out policies which seek to restrict emissions from transport and energy generation, and minimise water usage within new developments (Objective 3; Objective 6; KS19; KS20 and ME7).

‘Options for Consideration’ Health Impact Assessment

2.307 The Health Impact Assessment does not identify any adverse impacts and identifies positive impacts on many of the health objectives - built environment, access to food, promotion of active travel, accessible recreational facilities, suitable community facilities and health facilities.

‘Options for Consideration’ Equalities Impact Assessment

2.308 The Equalities Impact Assessment identifies positive impacts on nearly all of the categories of community groups for Option LN18. The improvement of facilities in the urban, suburban and rural areas will benefit the whole community. Those who will benefit most will be those who currently find accessing facilities and services difficult, the old, the young, disabled and those who do not have a car. These improvements will also provide venues for cultural activities, thus meeting the needs of different racial groups and religions.

Infrastructure Requirements

2.309 The Core Strategy Infrastructure Delivery Plan sets out what services and facilities will be required to support the existing and future population. These have been identified in partnership with service providers and utility companies as set out in their Asset Management Plans and Business Plans. The policy will be delivered in partnership with service providers, other Councils and community groups.

Conclusions

2.310 Option LN18 has received a strong majority support from the results of consultation and scores positively on the Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment. The approach is supported by existing and emerging national planning policy and local evidence.

2.311 In conclusion it is considered that Option LN18 is an appropriate approach to take forward subject to amendments in response to issues raised in consultation and to avoid duplication or unnecessary words.

2.312 In view of the deletion of Options LN19 and 20 (see later) it will be necessary to make reference in Option LN18 to the Councils still seeking developer contributions as Section 106 will still exist alongside Community Infrastructure Levy (CIL)

2.313 The following amendments are proposed:-

2.314 Second paragraph First sentence: Delete "urban areas" and replace with "settlements". After Highcliffe, insert "Burton". Delete last 2 sentences and replace with: "Some facilities can be provided in smaller settlement in innovative ways such as the provision of health care in the home. Services can also be provided in more innovative ways in suburban areas of Christchurch and East Dorset where access to facilities is more restricted to the car."

2.315 Delete 3rd and 5th paragraphs and replace with:- "The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings."

2.316 Delete last paragraph.

2.317 Add following sentence to end of policy "Where appropriate, financial contributions towards the provision of facilities and services will be sought".

Issue and Options Identified in 'Options for Consideration' Core Strategy:

How can we ensure that necessary community and cultural facilities are provided in step with new development?

Preferred Option LN 19

Introduction of a tariff based approach and on-site infrastructure delivered through s106 agreements

New development will put pressure on existing facilities and services. Consideration must be given as to how these can be funded and provided. The Government currently expects new development to contribute towards the provision of such facilities and the Core Strategy must determine whether this is an appropriate method, given the levels of growth which are proposed. On- site requirements will continue to be provided under S106 agreements.

In line with Government policy, all development will be subject to planning contributions towards community infrastructure. This is proposed to be in the form of a tariff based approach. Section 106 agreements will be used to ensure that any improvements which are required on site as part of the development are supplied.

Preferred Option LN 20

Continue to require planning obligations through S106 and not introduce a tariff based approach.

The Councils will continue to require planning obligations where applicable to a development.

Section 106 agreements will be used to ensure that any improvements which are required on site as part of the development are supplied. A tariff based approach which would provide for off-site infrastructure will not be introduced.

Consultation Response

Option	Support	Object	No Opinion	Total
LN19	8	4	0	12
LN20	6	1	0	7

Table 2.23

2.318 Comments on LN19 and LN20

2.319 Tariff Based Approach

- The wording of LN19 and LN20 reflects the transition time between governments when the future of Community Infrastructure Levy was in question. Christchurch and East Dorset Councils intend to confirm the use of Community Infrastructure Levy as an important means of gap funding infrastructure in the next version of the Core Strategy. DCC would welcome such clarification as the Community Infrastructure Levy will be an important mechanism for delivering key infrastructure for which the County Council is responsible. (Dorset County Council Spatial Planning)
- A tariff based approach would become impossible to operate under current Community Infrastructure Levy regulations - it would not meet the provisions of Regulation 122 (Tetlow King and Southern Planning Practice)
- Support as use of tariffs consistent with policies elsewhere in other core strategies such as transport and flood defence. (WYG Planning & Design)

2.320 Comments on LN20 in relation to tariff based approach

- LN20 is a preferred option yet proposes not to introduce a tariff based system and instead continue with Section 106 agreements as the sole means of securing developer contributions. As from 2014 national legislation will require a tariff based Community Infrastructure Levy to fund infrastructure not directly related to a specific development. It is understood that it is the intention to clarify this position and reflect the latest Government position regarding tariffs in the plan, which should help provide the necessary certainty over the role of developer contributions.(DCC Spatial Planning)
- LN20 in principle supported as appropriate mechanism for securing payments to mitigate harm from development. Until the operation of Community Infrastructure Levy regime is certain, my clients reserve their position in relation to its application. It is expected for the urban extension that S106 payments will remain the most effective means of mitigating harm and ensuring development is sufficiently served by infrastructure.(Jackson Planning Ltd)
- Option LN20 proposes to continue to require planning obligations through S106 and not introduce a tariff based approach. It is noted that the use of tariffs is proposed throughout the document in relation to other policies such as transport and flood defence. The document should be consistent in its approach in this respect. Policy should accord with circular guidance and Community Infrastructure Levy regulations in being fair and reasonable and related to development proposed.(WYG Planning & Design)

2.321 General Support to approach

- Support as AONB Management Plan objectives would be suitable use of Community Infrastructure Levy (Cranborne Chase and West Wiltshire Downs AONB).
- Support - essential that development contributions fund facilities both on-site and off-site infrastructure and are provided in step with development. To meet the requirements of Habitats Regs, should be provision of Suitable Alternative Natural Greenspace before new homes occupied. (Environment Theme Action Group East Dorset)
- Supports LN19 and LN20 which seek to ensure contributions and infrastructure are provided in step with new development in order to promote self containment of settlements. (Highways Agency)
- Support. On site infrastructure should continue to be provided through Section 106 Agreements and a tariff based approach should be introduced to improve community facilities (St Leonard & St Ives Parish Plan Group?).

2.322 Objections to Approach

- Object - no control over where money is spent
- Object as this may be the appropriate place to set out the Government's New Homes Bonus provisions, which are specifically designed to benefit the communities within which new development is planned.(Taylor Wimpey)

2.323 General Comments

- Developers should only contribute to transport improvements if this means roads. They should not contribute to subsidising bus services.

2.324 Housing Focus Group 8 December 2010

2.325 As part of the Core Strategy 'Options for Consideration' consultation a Housing Focus Group was held to discuss the consultation options. The Focus Group comprised a wide range of representatives of housing issues including Housing Associations, housing department staff, developers and local agents.

2.326 Relevant points raised in relation to Options LN19 and LN20 included:

- Concern about impact on viability of schemes if developer expected to pay for infrastructure. Government should also pay. What happens if there is a gap between funding available and infrastructure needed to accommodate development? New Homes Bonus may go part way to meet shortfall but it may not be enough.
- Homes and Communities Agency should act as a pump primer to provide infrastructure in advance of development. However question whether our schemes are big enough to trigger these sorts of payments.

- There should be strict guidelines on what the developer should reasonably pay for. Community Infrastructure Levy should be reasonable and realistic
- Who decides the priorities for infrastructure provision - members or local residents?
- Concern about impact of localism on Community Infrastructure Levy - sub regional infrastructure may be forgotten.
- Evidence needs to be robust and up to date on what is needed for a new development. We need to really understand what infrastructure is necessary for the level of development proposed.
- Need to look at the most cost effective way of providing necessary infrastructure.

2.327 Response

2.328 This is no longer an issue for the Core Strategy. See conclusions below.

Consideration of Evidence and Policy

2.329 The Planning Act 2008 established powers to create a Community Infrastructure Levy in England and Wales. The Community Infrastructure Levy regulations (2010) made the first use of these powers and came into effect in April 2010. Final confirmation of the Community Infrastructure Levy (CIL) was not until November 2010.

2.330 The Community Infrastructure Levy is a new levy that local authorities can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods identify as necessary.

2.331 Authorities that wish to charge a levy need to develop and adopt a Community Infrastructure Levy charging schedule. This sets out the proposed Community Infrastructure Levy rates expressed as pounds per square metre of floor area.

2.332 The charging authority needs to consider what additional infrastructure is needed in its area to support development and what other funding sources are available. The authority can then identify the gap in the funding of these projects to calculate the aggregate funding gap the levy is intended to address. This should be balanced against viability.

2.333 Legislation requires a charging authority to use 'appropriate available evidence' to inform their draft charging schedule. Appropriate evidence must include an up-to-date development strategy for the area - normally set out in a draft or adopted core strategy.

2.334 The levy is considered to be more transparent and straight forward than using planning obligations to fund infrastructure that supports the development of the area, especially large infrastructure projects. However, planning obligations may still have a role to play in terms of site specific infrastructure that mitigates the specific impacts of a development.

‘Options for Consideration’ Sustainability Appraisal

Relevant Sustainability Appraisal Objectives	Preferred Option LN19	Preferred Option LN20
5: Reduce the need to travel	Strong Positive Impact	Positive Impact
7: Healthy lifestyles	Strong Positive Impact	Positive Impact
9: Social cohesion and access to services	Strong Positive Impact	Positive Impact
12: Sustainable economic growth	Strong Positive Impact	Positive Impact

Table 2.24

2.335 Option LN19 which promotes the provision of facilities through developer contributions has positive impacts on several of the Sustainability Appraisal objectives. It should ensure funds are available to support the provision of facilities. As option LN20 relates to planning obligations the main benefits of the development to the wider community are more limited to the people living on and within close proximity to the actual development. Option LN19 has more positive impacts overall.

‘Options for Consideration’ Habitats Regulations Assessment

2.336 The Habitats Regulations Assessment concluded that Options LN19 and LN20 are not likely to have a significant effect on European sites as the options themselves would not lead to development.

‘Options for Consideration’ Health Impact Assessment

2.337 The Health Impact Assessment does not identify any adverse impacts and identifies positive impacts on many of the health objectives - built environment, access to food, promotion of active travel, accessible recreational facilities, suitable community facilities and health facilities.

‘Options for Consideration’ Equalities Impact Assessment

2.338 The Equalities Impact Assessment identifies positive impacts on most of the community groups. The use of a tariff system of contributions to deliver funds which can be used to support the community will add benefit to Option LN18 above.

Infrastructure Requirements

2.339 None as this policy has developed to support the provision of infrastructure, not specifying what this should be. The Infrastructure Development Plan will set out the strategic infrastructure requirements to support development.

Conclusion

2.340 Options LN19 and 20 have been overtaken by events. The Government's final confirmation of the Community Infrastructure Levy was not announced until November 2010, after publication of the Core Strategy Options for Consultation Document. The Councils are planning to prepare a joint Christchurch and East Dorset Community Infrastructure Levy Schedule. This will set out a schedule of rates of developer contributions towards infrastructure costs associated with development.

2.341 In conclusion there is no longer a need to progress Options LN19 and LN20 through to the Pre-Submission document. However Pre-Submission Policy LN6 will refer to developer contributions as Section 106 will still exist alongside the Community Infrastructure Levy.

2.342 Omissions

2.343 St Leonards and St Ives

2.344 Mrs J Brough suggests that its about time there was some street lighting in St Leonards, St Ives and Ashley Heath and some local shops. All these dwelling places and no nearby shops within walking distance.

2.345 Response

2.346 This is not an issue for the Core Strategy, but will be taken into consideration in the later stages of the development of the Core Strategy.

2.347 Facilities in West Moors

2.348 Mrs Irene Sanderson is concerned there is little mention of polices for West Moors in the document.

2.349 Response

2.350 Whilst there are many references to West Moors throughout the Strategy for example in the Vision and Strategic Objectives Chapter. The settlement will feature in the later Development Plan Documents, with site specific proposals as deemed necessary, but does not feature at this strategic stage, as major growth is not proposed there.

2.351 Housing in Ferndown

2.352 Sylvia Allen requests that there should be no more retirement properties in Ferndown as the town is saturated with retired people. Only houses for couples and young families e.g. starter homes.

2.353 Response

2.354 Preferred Option LN1 recommends the overall, the size and type of new market and affordable dwellings across the District, will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. It is proposed this Option is taken forward into the Pre-Submission Options Document.

2.355 Facilities in Sturminster Marshall

2.356 Various local residents have written to support the provision of allotments, a new play area, skate park and tennis courts, and an extension to the AONB in the settlement. Some suggest the industrial estate should not be extended, but should provide these facilities instead. Mrs Britton is a landowner who could offer these facilities on land currently in the Green Belt, but requires the community facilities to be provided with 'a modest mix of sustainable and affordable housing as a mixed development that not only catered for the aspiring classes, i.e. Some detached housing, but allowed local youngsters affordable first time homes, a drop in centre for the elderly or a doctor's surgery.'

2.357 Response

2.358 Sturminster Marshall is recognised as a Rural Service Centre in the strategic settlement hierarchy, where residential development will be allowed of a scale that reinforces its role as a provider of community, leisure and retail facilities to support the village and adjacent communities. Development should however, be within the settlement boundary or in exceptional situations will be allowed in the Green Belt to provide rural exception site affordable housing, but not market housing as proposed. Small scale recreational facilities, such as allotments or playing pitches can be provided in the Green Belt without the need to release land from the Green Belt at a strategic level.

2.359 Local Recycling Facilities

2.360 Mr Phil Spencer suggests that Brook Road, Wimborne is already at capacity, and with the additional housing proposed, the facility will be under greater pressure. He suggests consideration to Option PC 4 at Blunts Farm is made to providing new recycling and refuse disposal facilities.

2.361 Response

2.362 The new Dorset Waste Partnership will be making a strategic review of household refuse and recycling needs in future months, and we shall be guided by their assessments and requirements in East Dorset and Christchurch.

2.363 Affordable Housing Provision

2.364 Mr and Mrs A J Abernethie have several suggestions for providing affordable housing in the area, including the use of Community Land Trusts, and 15/20% of new homes should be starter homes for those on wages which will not sustain a commercial mortgage; new housing estates should have allotments for not less than 20% of the houses, communal seating and a designed safe children's play area.

2.365 Councillor P G Bennett (Stour Ward at East Dorset) supports limited affordable housing in the Green Belt settlement of Shapwick, to infill plots where historically cottages once stood. This would be in conjunction with the support of landowner and for people with a local connection.

2.366 Mr K Brooks suggests the St Leonards Hospital site could provide an exception site for the delivery of affordable housing, although the access onto the A31 and lack of facilities on site may prove problematic.

2.367 Response

2.368 Policies LN1, LN9 and LN11 all support the provision of affordable housing delivery. The Council's Housing Enabling Officer will work with land owners and registered social landlords to deliver affordable housing. The provision of play space, allotments and open space will be delivered in line with the requirements of the Local Needs requirements of the PPG17 Sport and Recreation Survey, and Option HE8.

2.369 Conclusions

2.370 Many of these suggestions relate to housing matters which are site specific, or relate to the settlement hierarchy and affordable housing policies, so are dealt with in relation to these. Those that require new infrastructure are covered in the draft Infrastructure Delivery Plan.

3 Pre Submission Options

3.1 Dwelling size and type

Policy LN1

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and be informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Individual sites will be expected to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area.

All new housing will be required to be built to meet minimum living space standards for both internal and external areas. The Councils will produce a Supplementary Planning Document which will set out the detailed requirements of this policy. In the meantime the Councils will apply the Homes and Community Agency Housing Quality Indicators in relation to private open space, unit sizes, unit layout and accessibility within the unit.

3.2 Density of Development

Policy LN2

Design, layout and density of new housing development

On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30dph will be encouraged, unless this would conflict with the local character and distinctiveness of an area where a lower density is more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Strategic Housing Market Assessment, the master plan reports for new neighbourhoods and future Annual Monitoring Reports.

Proposals for high density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area and where residents have the best access to facilities, services and jobs:

- New greenfield housing sites (density range to be determined by outputs of master planning process)
- Town centres
- Along the Prime Transport Corridors
- Areas outside town centres with good access to public transport and essential facilities and services
- In areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant.

The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.

3.3 Meeting Affordable Housing Needs

Policy LN3

Provision of affordable housing

In order to maximise the delivery of affordable housing the Councils will require:

All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site.

A financial contribution provided by the developer will be acceptable on sites of under 5 units where it is not possible to provide affordable housing units on site.

On sites of 5 or more dwellings provision should be on-site but where it is not possible to provide affordable housing units on the site off-site provision on an alternative site may be acceptable.

If an alternative site is not available, a financial contribution in lieu of provision may be accepted.

Financial contributions should be of equivalent value to on-site provision.

Conditions or legal obligations will be used to ensure that affordable housing is secured and retained for those in housing need and with a Local Connection.

The mix of units will be subject to negotiation and agreement with the Council but in any event must reflect local housing needs identified in the latest Strategic Housing Market Assessment. Tenure split should normally allow for 30% intermediate housing, with the remainder being affordable rented or social rented.

Any planning application which on financial viability grounds proposed a lower level of affordable housing provision than is required by this policy must be accompanied by clear evidence.

3.4 Exception Sites for the Provision of Affordable Housing

Policy LN4

Affordable housing exception sites

Exceptionally land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed in order to provide affordable housing, in perpetuity provided that:

- The housing comprises 100% affordable housing
- Secure arrangements are included to ensure that its benefits will be enjoyed by successive as well as initial occupiers
- The proposed development would provide a mix of housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment
- The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape

This policy will apply to the following settlements:

East Dorset

- West Moors; St Leonards and St Ives; Three Legged Cross; Alderholt; Cranborne
- Furzehill; Gaunts Common; Gussage St Michael; Gussage All Saints; Hinton Martell; Holt
- Horton; Longham; Shapwick; Sixpenny Handley; Sturminster Marshall; Wimborne St Giles
- Witchampton; Woodlands

Christchurch

- Land Adjoining the built up area of Christchurch
- Burton; Winkton

3.5 Gypsies, Travellers and Travelling Showpeople

Policy LN5

Location of sites for gypsy and traveller sites

The following considerations should be taken into account when determining locations for Gypsy and Traveller sites and Travelling Showpeople sites:

1. Sites should be located to meet the needs of Gypsy & Traveller communities with a preference for close proximity to existing communities to use services and facilities, including schools, shops, medical facilities and public transport;
2. Sites should provide for adequate on-site facilities for parking storage, play and residential amenity;
3. Sites should allow for adequate levels of privacy and residential amenity for the occupiers;
4. Sites should not have an unacceptable impact on the amenities of adjacent occupiers; and
5. Sites should not result in a detrimental impact on the natural environment

Proposals for sites for Travelling Showpeople will also need to provide adequate space for residential, maintenance and storage uses and be:-

1. Well related to the public highway network to accommodate the safe passage of large vehicles and pedestrians.
2. Located so as to minimise the impact of on-site business activities on neighbouring properties,
3. Located so as to minimise the visual impact of the uses on the landscape.

3.6 Providing Services and Facilities to Serve Local Needs

Policy LN6

Community facilities and services

Facilities and services will be provided to support existing and future population growth and changes in the age profile by the following:

New facilities should be concentrated in the settlements of Christchurch, Highcliffe, Burton, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. This is where access can be by public transport, bike and on foot. Some facilities can be provided in smaller settlements in innovative ways such as the provision of health care in the home. Services can also be provided in more innovative ways in suburban areas of Christchurch and East Dorset where access to facilities is more restricted to the car.

The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings.

Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services.

New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities.

Loss of facilities will be resisted unless it is shown that the facility is no longer needed.

Where appropriate, financial contributions towards the provision of facilities and services will be sought.