



Planning Policy
Planning & Regeneration
Borough of Poole
Civic Centre
Poole
Dorset
BH15 2RU

SENT BY E-MAIL AND POST

31st March 2015

Dear Sir / Madam

POOLE CORE STRATEGY REVIEW ISSUES & OPTIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearing Sessions to discuss these matters in greater detail.

Plan Period

If the Review will not be completed until 2017 a proposed plan end date of 2031 is too short. In Paragraph 157 the National Planning Policy Framework (NPPF) recommends that Local Plans should "*be drawn up over an appropriate time scale, preferably a 15 year time horizon*" therefore the Poole Core Strategy should have an end date beyond 2031. It is suggested that the housing market area (HMA) authorities should co-ordinate their plan periods accordingly and in doing so commission any necessary evidence based work required. The same comments were submitted to the Purbeck Local Plan Review - Issues & Options consultation ending on 13th March 2015.

Housing Needs

The existing Poole Core Strategy adopted in February 2009 proposes a housing requirement of 10,000 dwellings (500 dwellings per annum) up to 2026. However the Draft South East Dorset Strategic Housing Market Area

Assessment (SHMAA) now suggests an increase in the annualised housing requirement to 700 dwellings per annum for the period to 2031. It is noted that this report is only a draft version. At this time the HBF does not have a definitive opinion on the full objectively assessed housing needs (OAHN) for the HMA nor the appropriate distribution of OAHN across the HMA therefore the HBF reserves it right to comment further on the OAHN when the final version of the SHMAA is published. At which time the HBF will undertake a detailed analysis of the final version of the SHMAA report and make appropriate comments at later stages of the plan making process. However suffice to say that under the NPPF *“to boost significantly the supply of housing local planning authorities should use their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”* (Paragraph 47). The National Planning Practice Guidance (NPPG) sets out that household projections produced by DCLG are just the starting point for OAHN (ID 2a-015-20140306). Other factors such as economic forecasts, worsening trends in market signals and affordable housing needs should also be considered which may necessitate an upward adjustment above demographic projections (ID 2a-018-20140306, 2a-019-20140306 and 2a-020-20140306). These other factors are of particular importance in Borough of Poole if the District is to maintain its position within South East Dorset as a key focus for employment and to lessen the shortage of affordable housing.

There is also some confusion over HMAs which should be clarified by the Council. There are references to Bournemouth & Poole HMA, South East Dorset HMA and Eastern Dorset HMA.

Housing Supply

It is noted that the Council uses only 5% buffer when calculating its land supply. However since 2006/07 average completions have been only 450 dwellings per annum which is less than the annualised requirement. Indeed on the revised trajectory since 2009/10 actual completions have constantly been below the annualised requirement. As part of the review process the Council should consider whether or not a 20% buffer is more appropriate.

It is understood that the largest regeneration site for 1,300 dwellings on the former power station site may not be delivered and as a consequence the Council would not have a 5 years housing land supply (YHLS). If there is not reasonable certainty that the Council has a 5 YHLS the Core Strategy is not sound as it would be neither effective nor consistent with national policy (Paragraph 47 of NPPF). Moreover if the Core Strategy Review is not to be out of date on adoption it is critical that the land supply requirement is achieved as under Paragraph 49 of the NPPF *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”*.

It is suggested that when the Councils is identifying locations for growth and site allocations to meet the Boroughs OAHN the widest variety of sites by size, location and market type is considered to maximise housing delivery.

Duty to Co-operate

It is agreed that **Policy PCS36** on joint working should be modified to reflect the Duty to Co-operate. An on-going dialogue with neighbouring authorities is essential to ensure that full OAHN are met in the HMA. The Duty to Co-operate is pertinent to the alternative growth strategies which the Council is considering :-

- **Option 1** of continuing with the existing strategy (less than 700 dwellings per annum) which would not meet OAHN is unsound unless neighbouring authorities have agreed to meet Poole's unmet needs ;
- **Option 2** of meeting OAHN (700 dwellings per annum) by increasing densities on existing sites or outward expansion or a combination of both ;
- **Option 3** for higher growth including a contribution to unmet needs from surrounding authorities (more than 700 dwellings per annum) could only be pursued in co-operation with other authorities as a result of agreement under the Duty to Co-operate.

Green Belt

It is noted that the Council is undertaking a review of the Poole Green Belt. The Green Belt Review is integral to two out of three of the growth strategy options (Option 2 : Growth to Meet Needs and Option 3 : Higher Growth) under consideration by the Council. It is agreed that in order to meet in full OAHN the Council will need to allocate additional sites for residential development as well as infill sites within the built up areas and the intensification of development on existing sites. If the initial findings of the Green Belt Review have identified land which no longer fulfils one of the five purposes of Green Belt designation as specified in the NPPF (Paragraph 80) then these areas should be considered for future development.

Affordable Housing

The adopted Core Strategy under **Policy PCS6** proposes an affordable housing target of 40% on sites of more than 11 units. However in the past few schemes have achieved this target. Since 2006 only 600 affordable houses have been built at an average of 75 dwellings per annum rather than the target of 175 dwellings per annum. This is due to viability constraints in particular on brownfield regeneration sites. This lack of delivery of affordable housing is worsening affordability. The up-dated Viability Study – Poole Core Strategy Review Plan Viability, CIL and Affordable Housing Study dated December 2014 recommends reduced affordable housing provisions and CIL charges. The targets for affordable housing are proposed as :-

- North Poole, Lilliput/Branksome Park and Sandbanks – 40% ;
- Poole town centre – 20% ;
- The rest of the Borough – 0% ;
- Retirement and assisted living extra care schemes – 40%.

Therefore **Policy PCS6** should be amended accordingly.

Infrastructure & CIL

It is agreed that **Policy PCS37** is modified to reflect the role of CIL and use of S106 Agreements. It is also noted that the Council is consulting on a separate but inter-related consultation on a revised CIL charging schedule. It is proposed to reduce CIL charges as follows :-

- Sandbanks - £1,300 square metre ;
- Lilliput / Branksome Park - £370 square metre ;
- North Poole £180 - £200 square metre ;
- Poole town centre - £60 square metre ;
- Rest of Borough - £20 square metre ;
- Retirement and assisted living / extra care schemes - £120 square metre ;
- Brownfield sites - £30 square metre.

However the actual workings of the proposals are not clear, for example what CIL is chargeable for a retirement housing scheme on a brownfield site in Poole town centre? Is it £120 square metre, £60 square metre or £30 square metre? To be effective any proposed policy should be easily understood by land owners and developers when making planning permission applications therefore the Council should provide further clarification.

Other Policies

The Council should re-check its policies for compliance with the Written Ministerial Statement dated 25th March 2015 concerning parking standards, zero carbon homes and housing standards. In the meantime it is agreed that **Policies PCS8, PCS31, PCS32, PCS33 and PCS35** should be revised to remove standards for renewable energy and Lifetime Homes. It is also agreed that **Policy PCS27** should be amended to remove reference to sprinkler systems.

Conclusion

We trust that our comments will be helpful in informing the next stages of the Poole Core Strategy Review. In the meantime if the Council requires any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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