

Poole Local Plan  
Growth & Infrastructure  
Borough of Poole  
Civic Centre  
Poole  
Dorset  
BH15 2RU

SENT BY E-MAIL ONLY TO  
planning@poole.gov.uk

7th September 2018

Dear Sir / Madam

## **POOLE LOCAL PLAN MAIN MODIFICATIONS 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 representations to specific Main Modifications (**MM**) proposed by the Council.

The HBF is supportive of proposed main modifications which address concerns raised in our previous representations including :-

- **MM2 to Policy PP2 : Amount & Broad Location of Development** – clarifying that the housing requirements are minimums and densities on individual sites will be considered on a case by case basis against indicative densities ;
- **MM8 to Policy PP8 : Type & Mix of Housing** – clarifying that housing mix will be determined on a case by case basis taking into consideration individual site characteristics, the SHMA, site viability and other relevant evidence ;
- **MM11 to Policy PP11 : Affordable Housing** – deleting the prefix "a minimum of" and clarifying that on sites of 11 – 20 dwellings financial contributions will be acceptable if Registered Providers are unwilling to accept on-site provision ;
- **MM12 to Policy PP12 : Housing for an Ageing Population** – clarifying that under **Bullet Point (2b)** the Council will "explore" rather than



“secure” opportunities for the provision of new care home bed spaces in new large scale residential developments.

The HBF have no comments on proposed amendments to site specific allocations / policies such as **MM4**, **MM5**, **MM9** and **MM10** and / or policies relating to non-residential matters.

However the HBF have the following remaining concerns :-

- **MM7 to Policy PP7 : Facilitating a step change in housing delivery**

Under **MM7** the proposed stepped trajectory is retained and the Liverpool approach to recouping shortfalls is introduced (see extract below).

### Stepped housing target

Through implementation of the above measures the Council expects to achieve a step change in housing delivery by the end of the plan period ~~to be phased~~ as follows:

2013 to 2018 – 500 homes per annum

2018 to 2023 – 710 homes per annum

2023 to 2033 – 815 homes per annum

~~In demonstrating a 5 year housing land supply the Council will use the stepped housing target above, with any under delivery spread over the remainder of the plan period (known as the Liverpool approach).~~

~~This stepped approach will enable the Council to ensure sufficient mitigation measures are implemented in time to facilitate development without causing harm to European and internationally important protected sites wildlife. Whilst the above stepped housing target phasing is the minimum delivery expected, and a higher level of growth would need to be supported by appropriate heathland mitigation, than anticipated is not restricted. A full review of the mitigation strategy will be necessary before 2023 to provide the certainty needed that the levels of growth planned for 2023-2033 will not have an adverse effect upon European and internationally important sites protected wildlife, and to allow the market time to increase the rate of delivery.~~

During the relevant Examination Hearing Session the HBF and other parties raised concerns about the Council’s proposed use of a stepped housing trajectory and Liverpool approach in the 5 Year Housing Land Supply calculation. In response to **MM7** the HBF would argue that if the stepped housing trajectory is to be accepted then post adoption of the Local Plan any

shortfalls in delivery measured against the stepped trajectory should be recouped on a Sedgefield rather than Liverpool approach. There should be no departure from the Government’s preferred approach as currently set out in the National Planning Practice Guidance (NPPG ID 03-035). The Draft NPPG published in March 2018 also states that the Council should deal with shortfalls against planned requirements within the first five years of the plan period. Any further delays in meeting housing needs measured against a stepped trajectory is failing those households who need homes. It is important to remember that this is not just a theoretical mathematical numbers exercise but represents actual households in housing need today so it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed. The use of a stepped housing trajectory and a Liverpool approach post adoption of the Local Plan would represent a “double whammy” to housing delivery. It is noted that the Inspector (Jonathan Bore) examining the Guilford Local Plan concluded that *“There are important issues regarding the timing of housing delivery. I am prepared to accept that the Liverpool methodology on its own is valid, given the scale of the strategic allocations and the infrastructure issues associated with them. However, the submitted plan’s level of delivery in the early years, based on a stepped trajectory combined with the Liverpool methodology, is not acceptable. It would negate the purpose of the 20% buffer (which the Council accept), frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy which is seeking to boost the supply of housing”* (Inspector’s Note ID/6 para 14). These criticisms are equally applicable to Poole’s proposed approach. The method for recouping shortfalls post adoption should be re-considered.

- **MM11 to Policy PP8 : Affordable Housing**

The removal of the prefix “preferred” means that the Council’s policy requirements for tenure mix in **Bullet Point (e)** of **Policy PP8** is more prescriptive and less flexible than previously proposed (see extract below). It is not evident that this pre-determined fixed tenure mix was viability tested.

(e) The Council’s preferred tenure mix is 70% affordable rent and 30% intermediate housing.  
(f) The Affordable housing provided under this policy should always be available to meet local needs and to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative housing provision must be kept affordable in perpetuity.

The definition of Affordable Housing in the revised National Planning Policy Framework (NPPF) published in July 2018 includes Starter Homes, discounted market sale housing and other affordable routes to homeownership (including those which may not be funded by public grants). The new wording in **Bullet Point (f)** would not be applicable to such affordable housing. The Council should re-consider **Bullet Point (f)** for consistency with national policy and the weight that could be attributed to it by applicants for planning permission and Council decision takers in the future.

## **Conclusion**

For the Poole Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. **MM7** and **MM11** are inconsistent with national policy, not positively prepared, unjustified and ineffective so **MM7** and **MM11** are unsound. It is hoped that these representations are of assistance to the Council and the Inspector in preparing the final stage of the Poole Local Plan. In the meantime, if any further information or assistance is required please contact the undersigned.

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



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**