

Purbeck Local Plan Review 2019

Matter B: Housing Need & Requirements

Further representations

Wednesday 3 July 9.30am

	Consultee ID	Name/Organisation
1	1191253	Catesby Estates Ltd
2	996484	Home Builders Federation
3	1188067	Welbeck Land
4	1191216	Mr J Lloyd
5	1191219	Westcoast Purbeck Ltd
6	1190247	Bloor Homes Southern
7	1191125	Bellway Homes Ltd & A F Baggs
8	1190024	Wyatt Homes (Upton & Lytchett Matravers)
9	1188328	Wareham Town Council Neighbourhood Plan Steering Group

EXAMINATION OF THE PURBECK LOCAL PLAN (2018-2034)

EXAMINATION STATEMENT ON BEHALF OF CATEBSY ESTATES PLC

Matter B – Housing Need and Requirement

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May 2019

EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter B – Housing Need and Requirement

23 May 2019

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EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter B – Housing Need and Requirement

23 May 2019

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Estates Plc (“Catesby”), to those Questions raised by the Inspector (dated 10 May 2019), relating to Housing Need and Requirement in respect of the Purbeck Local Plan (2018-2034) (“the Plan”) and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Catesby Estates Plc.

2.0 Matter B – Housing Need and Requirement

- (i) *Has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:*
- *Setting the baseline;*
 - *The adjustment to take account of affordability; and,*
 - *Capping the level of any increase?*
- 2.1 The Council’s assessment of housing need for the Plan is set out in the SHMA update prepared by GL Hearn [SD20].
- 2.2 Given the Government’s recent advice set out in its response to the technical consultation published in March 2018¹ and the consequential amendments made to the Framework 2019 and the National Planning Practice Guidance (“PPG”) Catesby considers that the approach the Council has taken, applying the 2014-based household projection data is correct.
- 2.3 In this respect the starting point in the assessment is as set out in Table 1 on Page 7 of SD20, namely, 118 dpa.

¹ Government response to the Planning for the right homes in the right places consultation - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685293/Government_response_to_Planning_for_the_right_homes_in_the_right_places_consultation.pdf

- 2.4 Having regard to the affordability ratio data for Purbeck, which at 2016 stood at 10.79 the adjustment factor calculated in Table 3 on Page 8 of SD20 is also correct. However more recent affordability data as set out in Table 7 on Page 10 of SD20 confirms that the affordability ratio is actually worsening and has risen to 11.05 in 2017.
- 2.5 In this respect the adjustment to take account of affordability should be set at least 142% when the standard method is applied.
- 2.6 GL Hearn refer to the fact that there is 'no cap applied'² to Purbeck. This is not correct.
- 2.7 The PPG confirms that in circumstances where the existing Local Plan was adopted over 5 years ago, which is the case for Purbeck, the local housing need figure is capped at 40% above, whichever is the higher, the requirement in the old Local Plan or the projected household growth over the 10 year period³.
- 2.8 In the case of Purbeck the 40% cap should be applied to the projected household growth over the 10 year period, which is 118 dpa identified in Table 1 on Page 7 of SD20.
- 2.9 This would generate a capped local housing need figure of 165 dpa, which is slightly below the 168 dpa set out in Table 4 on Page 9 of SD20. Catesby would however still support the minimum starting point of 168 dpa.
- 2.10 Notwithstanding the above observation Catesby considers the local housing need figure should be adjusted in an upward direction for the reasons set out below.

(ii) *The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG?*

- 2.11 Catesby considers that the standard method should be applied in the case of Purbeck and there are no exceptional circumstances to justify an alternative approach.

² Paragraph 2.11 on Page 8 of SD20

³ Paragraph: 004 Reference ID: 2a-004-20190220 Revision date: 20 02 2019

- (iii) *The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*
- (a) *Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?*
- (b) *Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard method to calculate housing need?*

2.12 In Catesby's view there are clear circumstances that indicate the Plan needs to accommodate a higher housing need figure than the standard method indicates, which are as follows:

Economic Need:

- 2.13 It is clear from the data explored in the SHMA Update [SD20] that the economic led housing need scenarios using 2014-based HRRs generate a need for an uplift to the minimum starting point established by the standard method. It is vitally important that economic trends and household formation are aligned if a Local Plan is to successfully achieve sustainable growth.
- 2.14 The PPG confirms that the standard method does not attempt to predict changing economic circumstances that may affect demographic behaviour⁴.
- 2.15 The Council's Economy Background Paper 2018 [SD25] confirms that Purbeck is part of the Dorset LEP and Dorset Strategic Economic Partnership ("SEP"). One of the core objectives of the SEP is to provide a business environment that accommodates up to 40,000 additional jobs by 2021⁵. Aligned with this is the objective to 'Ensure a sustainable, affordable and diverse housing market meets the needs of residents and employees relocating to the region.'⁶
- 2.16 The Council therefore identifies a need for between 8.8-8.9ha of additional employment land to accommodate the circa 1,700 additional FTE jobs to be created in Purbeck. Notwithstanding this the Council is continuing to pursue 11.5ha of additional employment land suggesting that there is an expectation of higher jobs growth in the Plan area over the Plan period⁷.

⁴ Paragraph: 010 Reference ID: 2a-010-20190220 Revision date: 20 02 2019

⁵ Paragraph 23, first bullet point on Page 7 of SD25

⁶ Paragraph 23, final bullet point on Page 8 of SD25

⁷ Paragraphs 32 – 38 on Pages 9-10 of SD25

- 2.17 It is therefore clear that jobs growth in Purbeck is of key importance, particularly given the role the District plays in the LEP and SEP.
- 2.18 Turning back to SD20 the uplift that GL Hearn identifies to align housing need with jobs growth brings the OAN upto 192 dpa.
- 2.19 In Catesby's view there is a clear and robust evidence base to justify an uplift to the OAN to 192 dpa as set out in Table 12 on Page 17 of SD20.

Affordable Housing Need:

- 2.20 The need for affordable housing in the District is significant.
- 2.21 The SHMA Update [SD20] confirms the need at 149 dpa, which is some 89% of the total local housing need figure proposed by the Council of 168 dpa⁸. This is an unsustainable level of affordable housing need and the Council has made no adjustment to its local housing need figure to accommodate this.
- 2.22 The Framework 2019 places great emphasis on addressing affordable housing needs as part of the Plan making process. The adjustment for affordability discussed under Question (j) above does not deal with affordable housing need albeit that if the adjustment is correct it should serve to stem worsening affordability in the District, which in turn increases those in need of affordable housing.
- 2.23 The Council's current policy approach to affordable housing delivery will see, at the highest level of the spectrum set out in draft Policy H11, 40% onsite provision. Even if the 40% onsite provision was to be applied to every residential scheme coming forward in Purbeck over the Plan period, which certainly will not be the case where nearly half of the total housing provision is via Windfalls, the Council will only achieve 67 dpa. This will lead to a shortfall of at least 75 dpa.
- 2.24 To address the affordable housing need in full based on draft Policy H11 the OAN would need to be increased to 373 dpa.
- 2.25 This clearly demonstrates a need to increase the OAN above the 168 dpa proposed by the Council and certainly aligns with the need for an uplift to reflect economic growth.
- 2.26 In Catesby's view the OAN should be set at least 200 dpa to take account of the above two factors. Whilst this figure would not address affordable housing need in full it would align housing need with jobs growth and make a meaningful contribution

⁸ Paragraph 123 on Page 33 of Housing Background Paper - SD19

towards affordable housing need without creating a local housing requirement figure that is unsustainable.

(iv) *Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the AONB, Green Belt and/or protected habitat sites?*

2.27 There is no evidence to support a figure below the standard method. The level of constraint present in the District is no worse than some other authorities where higher requirements have been set, for example, Guildford Borough.

(v) *Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to the local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?*

2.28 In short yes.

2.29 The SoCG now completed by the Council with its partner authorities [SD10a] confirms the expectation that Bournemouth and Christchurch will be unable to meet their needs. Both of these authorities are within the same HMA as Purbeck.

2.30 Whilst the SoCG indicates that the extent of the unmet need is unknown at the time of preparing the Plan it then goes onto include at Table 4 on Page 11 details of the OAN for each authority relative to the proposed housing requirement in emerging plans.

2.31 In the context of Bournemouth the OAN equates to 1,022 dpa applying the standard method or 1,458 dpa as set out in Table 4 on Page 9 of SD20. Bournemouth is clear that it will not meet this need in full – therefore unmet need will arise.

2.32 In the context of Christchurch the Regulation 18 consultation version of the emerging Local Plan (September 2018) sets out a requirement of 263 dpa against an OAN of 352 dpa applying the standard method⁹. This equates to an unmet need of 89 dpa or 1,780 dwellings over the plan period.

2.33 It is therefore clear that unmet need arises within the HMA that needs to be addressed and Purbeck has done nothing to deal with this matter in the Plan. Setting aside any DTC matters (see our Statement in relation to Matter A), there is evidence of unmet need to be addressed, in part, by this Plan.

⁹ Table 2 on Page 9 of SD10a refers.

2.34 Turning to neighbouring authorities the SoCG also confirms that there is a risk of unmet need arising from New Forest District. Neame Sutton is currently involved in the New Forest District Local Plan Examination and it is likely that unmet need will arise from the production of that Plan. In addition, the New Forest National Park Authority has recently published Main Modifications to its emerging Plan in April 2019. The National Park Authority confirms that it will provide 800 dwellings over the plan period against an OAN of 1,260 dwellings generating an unmet need of 460 dwellings¹⁰. This is not being met by New Forest District and therefore remains outstanding.

2.35 It is therefore clear that there is unmet need arising across the HMA and in neighbouring authorities and no allowance has been made in the Plan to address this. In Catesby's view an allowance should be made, particularly in the context of the known shortfall in Christchurch. Given that there are 6 no. authorities within the HMA and two have confirmed they will not meet their own needs, it would be reasonable for Purbeck to accommodate a ¼ of the unmet need arising from Christchurch, namely 445 dwellings.

2.36 Equally Purbeck should look at accommodating some of the unmet need arising from the National Park.

2.37 This approach accords with the advice in the PPG¹¹.

(vi) Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in Paragraph 65 of the Framework?

2.38 In short the approach set out in Policy H1 does not accord with Paragraph 65. It is clear that the Council is required to set out a housing requirement for designated neighbourhood plan areas, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The Council has not done this.

¹⁰ Page 56 of New Forest National Park Local Plan as proposed to be modified - <https://www.newforestnpa.gov.uk/app/uploads/2019/04/1-New-Forest-NPA-draft-Local-Plan-Proposed-Modifications-Consolidated-text-April-2019.pdf>

¹¹ Paragraph: 010 Reference ID: 2a-010-20190220 Revision date: 20 02 2019

3.0 Changes Sought

3.1 The table below sets out the changes that Catesby considers are necessary for the Plan to be found Sound in relation to the Local Housing Need or OAN:

	LPA Position	Neame Sutton Position
Demographic Baseline	118 dpa	118 dpa
Adjustment for Affordability	142%	142%
Standard Method OAN (min starting point)	168 dpa	168 dpa
Adjustment for Economic Signals/Affordable Housing	0	32 dpa*
Total OAN	168 dpa	200 dpa
Adjustment for Unmet Need	0	28 dpa**
Total OAN including Unmet Need	168 dpa (2,688 dwellings)	228 dpa (3,648 dwellings)

* See Paragraph 2.26 above

** See Paragraph 2.35 above i.e. 445/16 years

3.2 Without the above changes to the OAN/Housing Requirement in the Plan it fails the Soundness test of being Positively Prepared, Effective, Justified or Consistent with National Policy.

PURBECK LOCAL PLAN EXAMINATION
MATTER B – HOUSING NEED & REQUIREMENT

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 3rd December 2018. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document dated 10th May 2019.

Issue 1: Housing Need and Requirement (*Policy H1*)

Q1. The Inspector's Initial Questions [COR02-2019-04-05] sought comments from the Council on the implications, if any, of the revisions to the Framework and PPG made in February 2019 for the examination of the Purbeck Local Plan. In its response [COR03-2019-04-12] the Council advised that, in so far as the revisions included confirmation in the PPG that 2014-based household projections should be used to provide the demographic baseline when applying the standard method of calculating housing need and given that the housing need of 168 homes per year indicated in the Local Plan was calculated using 2014-based household projections, as set out in the Strategic Housing Market Assessment (SHMA) Update for Purbeck [SD20], it considers that the calculation of housing need is in line with the revised PPG.

In the light of the above has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:

- **setting the baseline ;**
- **the adjustment to take account of affordability ; and**
- **capping the level of any increase?**

As set out in the 2018 SHMA Update (SD20) using the standard methodology the Council has calculated Purbeck's Local Housing Need (LHN) as 2,688 dwellings (168 dwellings per annum). This calculation comprises :-

- A demographic baseline based on annual average household growth over a 10 year period using the 2014 SNHP of 118 households per annum for Purbeck for the period 2016 – 2026 ;
- An affordability adjustment factor of 0.42 using (local affordability ratio – 4 / 4) x 0.25 based on 2016 workplace-based median house price to median earnings ratio of 10.79 ;

- Local Housing Need of 168 dwellings per annum as calculated from (1 + adjustment factor of 0.42) x projected household growth of 118 ;
- The capping of any increase is not applicable.

As set out in the NPPG (ID 2a-008-20190220) LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised where appropriate. The LHN figure may change as inputs are variable and this should be taken into consideration.

The NPPG (ID 2a-004-20190220) states that when setting the baseline in Step 1 using 2014-SNHP the projected average annual household growth over a 10 year period should be used (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). It is noted that if a 10 year period based on the plan start date of 2018 – 2028 is used then household growth increases from 118 households per annum to 128 households per annum.

The NPPG also states that the adjustment to take account of affordability in Step 2 should use the most recent median work-place affordability ratios. It is noted that the 2018 SHMA refers to two higher affordability ratios of 10.84 in 2016 and 11.09 in 2017. The 2018 affordability ratio published after the date of submission for examination of the Purbeck Local Plan is not applicable as the LHN figure may be relied upon for a period of two years from the time the plan is submitted for examination. If these higher ratios are applied to 128 households per annum the figures increase to 183 and 185 dwellings per annum respectively. It is acknowledged that these higher figures potentially trigger the application of the cap but as set out in the NPPG capping the level of any increase in Step 3 does not reduce the need. If capped then the Plan should also be subject to early review. It is suggested that the increase is so minimal that a cap should not be applied.

Q2. The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG?

There are no exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology.

Q3. The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

- (a) **Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?**

The LHN is only the minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional. The Government's objective of significantly boosting the supply of homes remains (para 59) so it is important that housing need is not under-estimated.

The NPPG (ID 2a-010-20190220) states that there may, occasionally be situations where previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard methodology. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. It is noted that the 2015 SHMA identified an objectively assessed housing need of 238 dwellings per annum to support economic growth and vitality across the District. This higher figure included an uplift of 111 dwellings per annum based on the preferred Local Knowledge scenario in order to sustain a local workforce despite its ageing population. The updated economic-led housing need for Purbeck also showed a higher requirement of 185-192 dwellings per annum for the Baseline scenario (see Table 12 & para 3.27 of 2018 SHMA). Without such an uplift to the LHN the economic vitality of the District may be at risk.

The 2018 SHMA also identified a significant affordable housing need of 149 dwellings per annum in the District representing 90% of the overall LHN. It is noted that in Purbeck the median house price to median earnings ratio has increased from 4.75 in 1997 to 11.05 in 2017 which is higher than elsewhere in the South West and England. This means it is unaffordable for many local residents to buy or rent in the District. As set out in the NPPG (ID 2a-024-2-190220) total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

As set out in answer to Q1 changing the base date from 2016 to 2018 and / or using 2017 affordability ratio increases the LHN figure. It is also noted that unlike national demographic trends elsewhere for Purbeck the 2016 based SNHP are higher than the 2014 based SNHP using 2016 based SNHP (from the plan start date of 2018) and 2017 affordability ratio the LHN figure increases to 209 dwellings per annum. As the Housing Delivery Test is measured against the lowest figure of either the LHN or housing requirement the HBF encourages the Council to be more ambitious with the housing requirement figure set out in Policy H1.

(b) Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard methodology to calculate housing need?

Policy H1 : Local Housing Requirement proposes at least 2,688 dwellings (168 dwellings per annum) for the plan period of 2018 – 2034. The housing requirement in Policy H1 should provide for further flexibility above the LHN figure (also see answer to Q3(a)).

Q4. Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?

Purbeck Local Plan states that it is seeking to meet the housing need for the area it covers in full. There is no evidence to indicate that the housing requirement should be set at a lower level than the standard methodology LHN figure due to environmental constraints.

Q5. Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?

As set out in the 2019 National Planning Policy Framework (NPPF) the Purbeck Local Plan should be positively prepared and provide a strategy which as a minimum seeks to meet LHN and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). Under the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with other Eastern Dorset Housing Market Area (HMA) authorities to maximise the effectiveness of plan making. The Local Plan should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c). One key outcome from co-operation between the authorities should be the meeting of housing needs in full. A key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted.

The SoCG (SD10a) indicates that at present the extent to which other areas in Dorset can meet their own needs is not fully understood but there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs (see Table 4). The SoCG also indicates an unmet housing need is likely to arise from New Forest District which adjoins Dorset. Although Purbeck District Council will meet its own local housing needs in full, the SoCG shows a high likelihood of housing needs been unmet across the Dorset HMA and beyond. The likelihood of unmet housing needs is not adequately referenced in the Purbeck Local Plan indeed an unmet need may trigger an early review of the Plan.

Q6. Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in paragraph 65 of the Framework?

Policy H1 is inconsistent with 2019 NPPF (para 65) which states that the housing requirement for designated neighbourhood areas should be set out.

PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

RESPONSE TO MATTER B: HOUSING NEED AND REQUIREMENT

ON BEHALF OF WELBECK LAND

JUNE 2019



Carter Jonas

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1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter B: Housing Need and Requirement.
- Issue 1: Housing Need and Requirement (Policy H1)
 - Questions 1 to 6.

This statement should be read in combination with the Welbeck responses to the inspector’s other Matters.

2.0 INSPECTOR'S MATTER B: HOUSING NEED AND REQUIREMENT

Issue 1: Housing Need and Requirement (Policy H1)

Q1. ... In the light of the above has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:

- **setting the baseline;**
- **the adjustment to take account of affordability; and**
- **capping the level of any increase?**

2.1 Welbeck notes that the primary driver for the submission of the plan is to ensure that there is an up-to-date and robust framework for decision making based on accurate needs. Welbeck also notes that the council has suggested to the Inspector that the housing target in the submitted plan is in line with the current NPPF and PPG. Welbeck considers the housing needs and requirements hereunder.

2.2 In the 2018 revision of the NPPF (and the subsequent changes in 2019) Government introduced a 'simpler' standardised approach to understanding local housing needs. This revision to national policy is supported by updated planning practice guidance.

2.3 The relevant guidance is reference ID: 2a-004-20190220: *How is a minimum annual local housing need figure calculated using the standard method?* This guidance has three steps, and each is taken in turn for Purbeck in the following paragraphs (with our emphasis in guidance when necessary).

2.4 Step 1 - Setting the baseline. Using the 2014 mid-year projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period):

- (a) Current year (2019) = 20,452
- (b) Ten years hence (2029) = 21,757
- (c) Annual average = 131 (b – a / 10)

2.5 Step 2 - An adjustment to take account of affordability. The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used. No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

$$\text{Adjustment factor} = ((9.94 - 4) / 4) \times 0.25 + 1 = 1.371$$

2.6 The adjustment factor is therefore 1.371 and is used as:

Minimum annual local housing need figure = (adjustment factor) x projected household growth

$$\text{Minimum annual local housing need figure} = 1.371 \times 131$$

The resulting figure is 180.

- 2.7 For a plan period of 16 years (i.e. 2018 – 2034) this would equate to a minimum of 2880 dwellings.
- 2.8 Step 3 - Capping the level of any increase. A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10 year period identified in step 1; or
 - b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).
- 2.9 The extant housing target for Purbeck was adopted more than five years ago in 2012. Therefore the 40% increase cap described above is engaged. The target is identified in Local Plan Part 1 Policy HS as 2520 or 120 dwellings per annum.

Scenario a: $131 \times 1.4 = 183$

Scenario b: $120 \times 1.4 = 168$

- 2.10 The guidance suggests that the cap should be set at the higher of the two scenarios above, which would be scenario a. The figure of 183, however, is higher than the minimum set out in the standard methodology.
- 2.11 There is no guidance for what to do in this situation, and it would appear that the council has selected a figure that they are not entitled so to do. A 40% increase cap on the current housing figures is only acceptable where the target was adopted (or reviewed) in the last five years, and this is not the case in Purbeck. Therefore, the more reasonable approach should be to adopt the original minimum standard figure of 180 dwellings per annum.
- 2.12 Welbeck respectfully suggests that the increased housing requirement from 2,688 identified in Policy H1 to the standard methodology figure of 2,880 can be reasonably easily achieved, in part, at least through the allocation of land it is promoting at Wareham.

Q2. The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG?

- 2.13 Welbeck does not consider that there are any exceptional circumstances to allow for a different approach to identifying housing need. As explained above, in response to the

Inspector's question 1, the difference in requirement is not significant, and could be accommodated within the plan. This situation will however, need to be monitored, along with the unmet housing needs of neighbours to ensure a robust and up-to-date plan for Purbeck (and/or Dorset).

Q3. The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

(a) Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?

(b) Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard methodology to calculate housing need?

2.14 Welbeck is not aware of any circumstances at present that would require a housing need figure to be accepted that is higher than the standard methodology. There is an expectation that some unmet need may be arising for neighbouring authorities but this situation is still evolving and as such must be kept under review.

2.15 Welbeck notes that the housing requirement in Policy H1 is an 'at least' figure. This suggests that the council accepts that the requirement is a minimum. Welbeck suggests that the addition of the words 'in full' to the policy would provide additional certainty to the direction of the policy as follows (inserted words underlined):

"...at least 2,688 homes will be required to enable the District to meet its identified housing need in full"

2.16 Furthermore, In order for the Vision to be fully compliant with national policy – in particular paragraph 59 of the NPPF – it should be amended as follows (inserted words underlined):

The aim of the Purbeck Local Plan is to protect Purbeck's distinctive character whilst improving the quality of life for the local community. The natural and historic assets of the area will be protected, whilst continuing to manage effective recreational access and use. The Local Plan will meet, in full, the housing and employment needs of the District.

Q4. Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?

2.17 Welbeck considers that the exercises that the council has undertaken to date ably demonstrate that there is, in fact, greater capacity in the area than the requirement figure. Not least amongst the additional sites that are suitable, available and achievable are those promoted by Welbeck. One of Welbeck's sites has a greater capacity than is proposed for allocation in the Wareham NP, the others are not being allocated at all. Further detail is given in response to the Inspector's Matter E.

- 2.18 Moreover, the sustainability appraisal exercise and habitats regulations assessment both demonstrate that there is a reasonable prospect that housing development can be delivered and appropriately mitigated.

Q5. Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?

- 2.19 Welbeck considers the need to plan for likely unmet housing needs to be a key priority for Purbeck, and the new Dorset unitary authority. Given that the scale of the unmet needs, and the number of authorities from where it will emerge, is as yet unconfirmed it is not necessary to include a specific requirement in this iteration of the plan.
- 2.20 Welbeck does, however, submit that a trigger should be identified in both Policy H1 and IM1 for an early review of the plan (perhaps within two years) in the light of a proactive and collaborative programme of cooperation between the relevant authorities listed in the SoGC SD10a. This would provide confidence in the Local Plan strategy, demonstrate Purbeck / Dorset's commitment to the Duty to Cooperate and provide for flexibility to respond and adapt to changing circumstances.

Q6. Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in paragraph 65 of the Framework?

- 2.21 Welbeck has significant concerns about the approach to neighbourhood planning proposed in the plan, and also how it is already manifesting itself at Wareham in particular.
- 2.22 This approach is not consistent with national policy. It does not respect the order and primacy of elements of the development plan and the Local Plan should set the housing requirement for the NP not *vice versa*. The NPPF is clear at paragraph 65 that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

- 2.23 It is therefore incumbent on the Purbeck District Council to determine the housing requirement within the body of the Purbeck Local Plan and not to defer the determination of the housing requirement to some future process. Furthermore, given the strategic nature of the scale of development at Wareham and its importance to the overall delivery of the plan strategy there is significant risk is devolving this responsibility to a plan that does not have to meet the tests of soundness.

- 2.24 Welbeck's concerns with respect to the risk of the deliverability of the local plan strategy if development allocation is significantly devolved to NP appear to be borne out in considering the Wareham NP. The proposed NP is unlikely to deliver sufficient sites to provide for 300 new homes. Proposed site allocations include employment sites in current active use and a reliance on the chance of a significant amount (one third of the total requirement) of windfall development. It is clear that for Purbeck to be able to achieve and deliver its Local Plan vision and requirements it must give stronger direction to subsequent NP. This direction should include a clear target for housing site *allocation*, and potentially given the strategic importance of the towns in the area, at least some of that target should be included as allocated development sites in the Local Plan – additional allocations could be considered through each NP.

FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

7th June 2019

Your ref: Matter B: Housing Need and Requirement
Our ref: AB/3742

Dear Mrs Nolan

**Re: Final Written Submissions for the Purbeck Local Plan Examination
– Matter B on behalf of Mr J Lloyd; Representee ref. 1191216**

The following letter has been prepared in support of our final written submissions in advance of the Purbeck Local Plan Examination hearings in July and August 2019. The representation is made on behalf of Mr J Lloyd (1191216) in respect of the land within their control located outside of but adjoining the proposed strategic allocation Policy H4 – Moreton Station/Redbridge Pit.

A detailed comment is provided below in respect of the Council's Objectively Assessed Need and Housing Requirement figures, but also, following the recent publication by the Government of the results of the Housing Delivery Test, consideration of whether or not this remains appropriate and the Council will be able to demonstrate a 5-year housing land supply.

This is pertinent to the Inspectors' consideration of the soundness of the Local Plan approach having regard for the intended housing delivery trajectory within the earlier years of the plan period and the significant shortfall in housing which is being demonstrated now.

It is important that this shortfall can be arrested as soon as possible pursuant to the adoption of the new Local Plan. The Council should give careful consideration to whether additional numbers should be allocated at the proposed strategic sites in order to address these issues and meet what is an increasing housing need which substantially outstrips its proposed delivery.

Issue 1: Housing Need and Requirement

Q1 & Q2

We note the Council's response ref. COR03-2019-04-12 to the Inspector's Initial Question ref. COR02-2019-04-05 on this matter. We do not however agree with its conclusions.

The Council has submitted its plan for examination under the proviso that it is to be examined and tested against the up to date NPPF adopted 19th February 2019 and the latest iteration of guidance set out within the PPG.

It is the case therefore that, in respect of calculating the Objectively Assessed Need (OAN) for housing delivery within the plan period, that this should thus be based on the standard methodology. The presence or otherwise of any previous Strategic Housing Market Assessment (SHMA) is of no relevance.

If the Council determine that they are not to follow the direction of the NPPF in applying the standard methodology as the means of calculating housing need, then it is for the Council to justify how the 'exceptional circumstances' in order to allow for an alternative approach, apply to their plan and indeed local housing need.

The Council has explicitly not sought to justify why it considered that exceptional circumstances exist in order to reconcile the approach to calculating housing need it has taken with the expectations of National Policy. It has on the contrary determined that there is no conflict between the approach it has taken of relying upon a SHMA assessment and the standard methodology calculation as both approaches utilise the same evidence base of the 2014-based household projections as the demographic baseline.

Whilst the above point is true – both approaches utilise the 2014-based household projections as their baseline – that is where the similarities end. The standard methodology approach does not corroborate with or reflect that of a SHMA. The two are very materially different.

The Council's assessment provides a very much lower figure, to which an uplift has then been applied to help facilitate the delivery of affordable housing.

With reference to the Local Plan submission document SD01a; Chapter 4, Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take into consideration the need for 'affordable housing'.

This application of an uplift as stated within the Local Plan for 'affordable housing' is not however the same as an uplift for affordability within the District. This is indeed the approach within the standard methodology and appears to be the approach taken by GL Hearn within the 2019 SHMA update (SD20). The manner in which the Council has

described this uplift suggests that it has instead sought to apply an uplift to enable the supply of affordable housing for which there has been a significant under delivery within the District and as a result there remains a significant unmet need and not, as the SHMA update actually states, for the purposes of addressing affordability. This should be clarified, and the text amended accordingly to address this issue.

The SHMA update, SD20, does incorporate the standard methodology and has formed the baseline for the calculation, however this has been based on a starting year of 2017. The Council's Plan Period is intended to run from 2018 – 2034. As the starting date for the Local Plan, the Council should be assessing its housing need based on the base year of 2018 – not 2017. This has a material impact upon the figures both in respect of the affordability ratio and indeed the baseline data for projected growth in households.

Planning Practice Guidance (PPG) states at Paragraph 004 of the 'Housing Need' section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018 as the first year of the local plan period.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Section 5 of the NPPF provides the Government's approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Below we have run through in detail the calculation as per the standard methodology; it is important to point out that the Council has not sought to properly apply the standard methodology in that it has not sought to carry out the final stage (stage 3) of the assessment and apply a 'cap' on the housing need figure.

The GL Hearn report (SD20) at Para 2.11 on the contrary states that no cap needs to be applied to housing delivery within Purbeck.

The Council thus has not, within the SHMA 2018, sought to either calculate or apply any form of 'cap' to the housing need figure; it has left this as the raw number.

It is not the case that there is ever a circumstance where a capped figure need not be calculated; it may be the case that this does not come in to effect as the actual housing need, having regard for the test, does not change the housing need figure, however this does not mean that it is appropriate to disregard this element and evidence that the capped figure exceeds the housing need and thus does not come in to effect. A cap does apply to Purbeck's housing need, it is however the case here that the need does not reach and is unaffected by said cap. The statement within the SHMA (SD20) is thus fundamentally incorrect.

We consider the Council's housing need, as calculated in accordance with the standard methodology, to be as follows:

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of 185 dwelling per annum. This is the overarching 'capped figure' for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result, therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,
 - The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for **180 dwellings** per annum and not the 168 dwellings per annum it is currently planning for. The result is a **shortfall of 240 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

We do not consider therefore that the Council's assessment of housing need is correct or justified and thus the Council is not seeking to meet its actual assessed needs.

Q3 (a) & (b)

Following the calculation of housing need in accordance with the initial stages of the standard methodology, the Council has not seen it fit to apply any form of uplift to its housing need figure.

The Council has undertaken sensitivity testing of the OAN figure against projected job-growth for the District, the resolution being that there appears no justification for an increase in housing need to address economic growth and thus growth in the jobs market.

We have no particular comment on this element of the Council's conclusions.

The Council has also however considered whether or not there is a case for an uplift on housing need in order to address the significant need in the District for affordable housing and indeed historic shortfall in delivery.

The SHMA (SD20) states at Paragraph 4.25 that there remains a *notable need for affordable housing in Purbeck* and that *the Council should seek to maximise the delivery of affordable housing where opportunities arise*.

The 'notable need' referred to amounts to what the Council consider to be a net need of 149 dwellings per annum (dpa). The SHMA however does not seek to propose any uplift on housing need to seek to address the significant shortfall in affordable housing which exists.

It is notable that the need for affordable housing per annum is not too far off the overall OAN housing need figure of 180 dwellings per annum, by our assessment. There is no prospect, based on the Council's suggested affordable housing requirements on sites of 40% on Greenfield sites and 30% on brownfield sites delivering 'major development' as per the statutory definition set out within the Annex 2: Glossary to the NPPF. The Council also seeks to apply a lower threshold on those sites which seek to deliver housing within designated rural areas. The Council is seeking to impose an affordable threshold of 2 units in these areas. We will not comment on whether the affordable housing threshold itself is a reasonable approach in any event.

Considering the potential amount of affordable housing that the Council could deliver having regard for the thresholds suggested and the significant infrastructure constraints which will apply to the strategic sites and likely result in the need for a lowering of the affordable percentage on those sites on grounds of viability in any event, it is considered unlikely that the Council will make any significant dent in this affordable housing need across the plan period.

We consider therefore that the Council should therefore be looking to allow for some form of uplift on its housing needs in order to properly address the shortfall in affordable housing delivery to date.

We cannot comment on the exact figure which may be appropriate, this is a matter which should appropriately be tested having regard for 'policy on' constraints.

Q4

We do not consider that any justification exists for a lower housing need figure than that advocated by the standard methodology.

Q5

There does not appear to be the evidence base available to consider whether or not the Council should be seeking to take on the need of other neighbouring authorities at this time. There needs fundamentally to be some progress made by the neighbouring BCP Council and indeed the remainder of the now Dorset Council, in order to determine whether Purbeck should be seeking to assist with un-met need. Having regard for the particular environment of Purbeck District however, it is unlikely that the justification exists for its to meet the needs of others.

We consider however that there would however be considerable merit in it seeking to provide an uplift on housing delivery to address its shortfall in affordable housing as mentioned.

Q6

No Comment.

Yours sincerely

A black rectangular redaction box covering the signature of Adam Bennett.

Adam Bennett BA (Hons)
Town Planning Consultant

Direct email: adam@kppcltd.co.uk

Website: www.kenparkeplanning.com

FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

7th June 2019

Your ref: Matter B: Housing Need and Requirement
Our ref: AB/3056

Dear Mrs Nolan

**Re: Final Written Submissions for the Purbeck Local Plan Examination
– Matter B on behalf of Westcoast (Purbeck) Ltd; Representee ref.
1191219**

The following letter has been prepared in support of our final written submissions in advance of the Purbeck Local Plan Examination hearings in July and August 2019. The representation is made on behalf of Westcoast (Purbeck) Ltd (1191219) in respect of the land within their control at Binnegar Hall, Worgret Road, East Stoke, BH20 6AT.

A detailed comment is provided below in respect of the Council's Objectively assessed Need and Housing Requirement figures, but also, following the recent publication by the Government of the results of the Housing Delivery Test, consideration of whether or not this remains appropriate and the Council will be able to demonstrate a 5-year housing land supply.

This is pertinent to the Inspector's consideration of the soundness of the Local Plan approach having regard for the intended housing delivery trajectory within the earlier years of the plan period and the significant shortfall in housing which is being demonstrated now.

It is important that this shortfall can be arrested as soon as possible pursuant to the adoption of the new Local Plan. The Council should give careful consideration to whether additional numbers should be allocated at the proposed strategic sites in order to address these issues and meet what is an increasing housing need which substantially outstrips its proposed delivery.

Issue 1: Housing Need and Requirement

Q1 & Q2

We note the Council's response ref. COR03-2019-04-12 to the Inspector's Initial Question ref. COR02-2019-04-05 on this matter. We do not however agree with its conclusions.

The Council has submitted its plan for examination under the proviso that it is to be examined and tested against the up to date NPPF adopted 19th February 2019 and the latest iteration of guidance set out within the PPG.

It is the case therefore that, in respect of calculating the Objectively Assessed Need (OAN) for housing delivery within the plan period, that this should thus be based on the standard methodology. The presence or otherwise of any previous Strategic Housing Market Assessment (SHMA) is of no relevance.

If the Council determine that they are not to follow the direction of the NPPF in applying the standard methodology as the means of calculating housing need, then it is for the Council to justify how the 'exceptional circumstances' in order to allow for an alternative approach, apply to their plan and indeed local housing need.

The Council has explicitly not sought to justify why it considered that exceptional circumstances exist in order to reconcile the approach to calculating housing need it has taken with the expectations of National Policy. It has on the contrary determined that there is no conflict between the approach it has taken of relying upon a SHMA assessment and the standard methodology calculation as both approaches utilise the same evidence base of the 2014-based household projections as the demographic baseline.

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The Council's assessment provides a very much lower figure, to which an uplift has then been applied to help facilitate the delivery of affordable housing.

With reference to the Local Plan submission document SD01a; Chapter 4, Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take into consideration the need for 'affordable housing'.

This application of an uplift as stated within the Local Plan for 'affordable housing' is not however the same as an uplift for affordability within the District. This is indeed the approach within the standard methodology and appears to be the approach taken by GL Hearn within the 2019 SHMA update (SD20). The manner in which the Council has

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In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

We do not consider therefore that the Council's assessment of housing need is correct or justified and thus the Council is not seeking to meet its actual assessed needs.

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We have no particular comment on this element of the Council's conclusions.

The Council has also however considered whether or not there is a case for an uplift on housing need in order to address the significant need in the District for affordable housing and indeed historic shortfall in delivery.

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The 'notable need' referred to amounts to what the Council consider to be a net need of 149 dwellings per annum (dpa). The SHMA however does not seek to propose any uplift on housing need to seek to address the significant shortfall in affordable housing which exists.

It is notable that the need for affordable housing per annum is not too far off the overall OAN housing need figure of 180 dwellings per annum, by our assessment. There is no prospect, based on the Council's suggested affordable housing requirements on sites of 40% on Greenfield sites and 30% on brownfield sites delivering 'major development' as per the statutory definition set out within the Annex 2: Glossary to the NPPF. The Council also seeks to apply a lower threshold on those sites which seek to deliver housing within designated rural areas. The Council is seeking to impose an affordable threshold of 2 units in these areas. We will not comment on whether the affordable housing threshold itself is a reasonable approach in any event.

Considering the potential amount of affordable housing that the Council could deliver having regard for the thresholds suggested and the significant infrastructure constraints which will apply to the strategic sites and likely result in the need for a lowering of the affordable percentage on those sites on grounds of viability in any event, it is considered unlikely that the Council will make any significant dent in this affordable housing need across the plan period.

We consider therefore that the Council should therefore be looking to allow for some form of uplift on its housing needs in order to properly address the shortfall in affordable housing delivery to date.

We cannot comment on the exact figure which may be appropriate, this is a matter which should appropriately be tested having regard for 'policy on' constraints.

Q4

We do not consider that any justification exists for a lower housing need figure than that advocated by the standard methodology.

Q5

There does not appear to be the evidence base available to consider whether or not the Council should be seeking to take on the need of other neighbouring authorities at this time. There needs fundamentally to be some progress made by the neighbouring BCP Council and indeed the remainder of the now Dorset Council, in order to determine whether Purbeck should be seeking to assist with un-met need. Having regard for the particular environment of Purbeck District however, it is unlikely that the justification exists for its to meet the needs of others.

We consider however that there would however be considerable merit in it seeking to provide an uplift on housing delivery to address its shortfall in affordable housing as mentioned.

Q6

No Comment.

Yours sincerely

A black rectangular box redacting the signature of Adam Bennett.

Adam Bennett BA (Hons)
Town Planning Consultant

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Examination of the Purbeck Local Plan Matter B: Housing Need and Requirement (Policy H1)

Statement on behalf of Bloor Homes Southern

Q1. The Inspector's Initial Questions [COR02-2019-04-05] sought comments from the Council on the implications, if any, of the revisions to the Framework and PPG made in February 2019 for the examination of the Purbeck Local Plan.

In its response [COR03-2019-04-12] the Council advised that, in so far as the revisions included confirmation in the PPG that 2014-based household projections should be used to provide the demographic baseline when applying the standard method of calculating housing need and given that the housing need of 168 homes per year indicated in the Local Plan was calculated using 2014-based household projections, as set out in the Strategic Housing Market Assessment (SHMA) Update for Purbeck [SD20], it considers that the calculation of housing need is in line with the revised PPG.

In the light of the above has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:

- **setting the baseline;**
- **the adjustment to take account of affordability; and**
- **capping the level of any increase?**

1. As stated in Bloor Homes' original representation on Policy H1, Bloor Homes does not consider that the housing requirement for Purbeck will significantly boost the supply of new homes. There is a history in Purbeck of not preparing local plans to meet full need, and then not delivering on the artificially low targets that have then been set by policy.
2. The 2012 adopted local plan figure for Purbeck (of 120 homes per annum) was only accepted subject to an early partial review of the plan to fully meet OAN. The full OAN at the time was confirmed as 170 homes per annum.
3. If the 40% 'cap' / uplift is applied to the 2012 Purbeck OAN figure of 170 dwellings per annum, the district requirement would be 238 homes per annum. This matches the annual average requirement of the 2016 SHMA for Purbeck and is considered by Bloor Homes to be a more appropriate target to plan to if the supply of housing is to be boosted significantly. This total does not take into account unmet needs from the wider area outside of Purbeck which may also apply in the plan period.
4. Bloor Homes also considers that many of the homes allocated in the plan will be slow to deliver. A very high proportion of the allocated homes are distributed to settlements in the west of the district.



5. There is a risk of market demand in the western areas being lower (due to their rurality), and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council. This will further constrain the ability of the plan to significantly boost the supply of new homes.

Q2. The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG2?

6. See the above response to Q1.

Q3. The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

(a) Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?

(b) Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard methodology to calculate housing need?

7. See the above response to Q1.

Q4. Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?

8. Bloor Homes does not consider that there is evidence to indicate this. Indeed, in a April 2016 Purbeck committee report, officers advised based on available evidence that a higher housing figure of 238 homes per annum (or 3,080 additional homes over and above those already identified in the part 1 Purbeck Local Plan) could be achieved within the constraints of the district (Purbeck Local Plan Partial Review Action Group report, 19 April 2016, paragraphs 4.1 and 4.2).



Q5. Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?

9. The SoCG is itself evidence that the BCP Council area is likely to be unable to meet its needs and that substantial unmet housing need is also likely to arise from New Forest District by reference to the application of the standard methodology.

Q6. Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in paragraph 65 of the Framework?

10. No. The Local Plan should specify the housing requirement to be achieved by the neighbourhood plan areas.

**PURBECK LOCAL PLAN
MATTER B: HOUSING NEED
AND REQUIREMENT -
HEARING STATEMENT**

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1.0 **Issue 1 – Housing need and requirement (policy H1)**

Q1. Has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:

- **setting the baseline;**
- **the adjustment to take account of affordability; and**
- **capping the level of any increase?**

1.1 Paragraph 60 of the NPPF (2019) sets out that:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. (our emphasis underlined).

1.2 The 168 dwellings per annum figure appears to be produced using the standard method figure, as set out on page 9 of the SHMA Update for Purbeck (2019) (page 9). However, whilst it is appreciated that the Plan has been developed over a period when there have been updates to the standard method and the data used to generate the number of homes needed, we do not believe the figures are accurate because the latest data has not been taken into account.

1.3 The Planning Practice Guidance (reference ID: 2a-005-20190220) under setting the baseline, sets out that:

Using these projections (2014 household projections), calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Our emphasis underlined.

1.4 The SHMA (2019) (table 1, page 7) uses a 10-year period from 2016 to 2026 when it should use figures from 2019 (the current year) to 2029. The implication of this is that the annual average change in dwellings increase from 118 as set out in the SHMA to 131 (20,452 in 2019 to 21,757 in 2029).

1.5 The latest affordability ratio should also be used. This is 9.94.

1.6 Applying the most up-to-date data gives an OAN of 179 dwellings per year. This equates to the need to plan for an additional 176 dwellings (11 x 16) homes over the plan period, equivalent to an increase of some 7%.

- 1.7 Combined with points raised in relation to the Spatial Strategy and the lack of contingency and flexibility in land supply, it is suggested to be effective and consistent with national policy, the Local Plan needs to plan for at least an additional 460 dwellings. This figure would increase if it is considered that there is a need to cater for unmet need, as noted below.

Q2. The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG?

- 1.8 We are not aware on any justification for an alternative approach for calculating to the standard methodology or for pursuing a housing requirement below the standard OAN figure of 179 dwellings per annum.

Q4. Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?

- 1.9 There is no evidence to indicate the housing figure should be lower than 179 dwellings per year. Although we have raised concerns in relation to the overall spatial strategy and the proposed allocation of land in unsustainable locations, the Council itself have not sought to reduce the housing requirement based on environmental constraints as there is land available. Indeed, at preferred options stage, Officers advice to members was that they could accommodate a higher number of homes than is now proposed for allocation in the Local Plan. The Local Plan Advisory Group Paper (April 2019) (see **Appendix A**, paragraph 4.2) states:

However, the Council would need a robust justification if it were to plan for fewer homes. At this stage, the evidence indicates that the Council can provide for the full figure of around 3,080 additional homes within the constraints of the district. (our emphasis underlined).

- 1.10 In addition, the Local Plan (paragraph 111) indicates that neighbouring authorities have limited potential to accommodate additional growth given their own environmental constraints. Therefore, it is imperative that Purbeck plans to meet its full housing requirement.
- 1.11 Land to the West of Wareham has had a previous positive assessment and is sustainably located. The rationale for not taking it forward as part of the development strategy appears to be the availability of other suitable sites outside the AONB and Green Belt – not specifically the impact of the proposed development on the AONB. Therefore, AONB should not be seen as an absolute constraint to development and a justification for reducing the housing requirement.

Q5. Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?

- 1.12 The Statement of Common Ground recognises that the level of unmet need across Dorset is not yet quantified but that there is a risk that Bournemouth and Christchurch may struggle to meet their own needs.
- 1.13 Whilst this does not constitute evidence of a specific unmet need, it indicates that neighbouring authorities are likely to help meet Bournemouth and Christchurch's housing need in the future. It would therefore be prudent for the Purbeck Local Plan to build in a contingency to enable the delivery of additional housing to meet any future unmet need, particularly given that there are additional suitable sites, such as land West of Wareham, where this need could be accommodated.

APPENDIX 1

LOCAL PLAN ADVISORY GROUP PAPER (APRIL 2019)

Purbeck Local Plan Partial Review Advisory Group – 19 April 2016

Draft Partial Review Preferred Options consultation document

1. Purpose of report

To seek approval to present the draft Partial Review Preferred Options document to Council in May, with the aim of undertaking a public consultation during June and July 2016.

2. Key issues

- 2.1 At examination of the Purbeck Local Plan Part 1 (PLP1), the Inspector raised concerns that the Council had not fully explored all housing growth potential in the district. Therefore, in the PLP1 the Council agreed to undertake a partial review of the plan by 2017 to look at the potential for higher growth.
- 2.2 The Council undertook an 'Issues and Options' consultation in early 2016, to help inform the Partial Review. The Issues and Options consultation document set out a range of issues to be explored through the Partial Review, and suggested options for how they could be addressed. The Council received a total of 484 responses from the public and statutory consultees, and these responses have helped to inform the next stage of plan preparation, which is a 'preferred options' consultation.
- 2.3 Officers have prepared a draft preferred options consultation document, which sets out the Council's proposed strategy for meeting development needs whilst continuing to protect Purbeck's outstanding natural environment. The draft document is attached as **Appendix 1**. There are some elements of the document which are not yet completed. Officers will be providing a verbal update on these matters at the Partial Review Advisory Group meeting, with full draft text to be included as part of the papers for full Council.

3. Recommendation

That a report be submitted to Council recommending:

- (1) that the Partial Review Preferred Options document be published for public consultation during June and July 2016; and
- (2) that the Council delegates agreement of the final version of this document for consultation to the General Manager – Planning and Community Services, in consultation with the Chairman of the Partial Review Advisory Group.

4. Further information

- 4.1 One of the major issues the Partial Review needs to address is the potential for additional housing growth over and above that identified in the PLP1. The Eastern Dorset Strategic Housing Market Assessment (SHMA) was published in December 2015 and identifies an objectively assessed need for 238 homes per annum in Purbeck, over the period 2013 to 2033, based on an economic-led projection. The economic-led projection considers the level of housing provision necessary to support employment growth.

- 4.2 Based on the findings of the SHMA, the Council would need to find approximately 3,080 additional homes (over and above those identified in PLP1) in order to meet the district's objectively assessed needs in full (up to 2033). Government guidance is clear that the SHMA is just a starting point, and that the housing needs figure should be tested against local constraints such as environmental designations and impacts on the transport network. However, the Council would need a robust justification if it were to plan for fewer homes. At this stage, the evidence indicates that the Council can provide for the full figure of around 3,080 additional homes within the constraints of the district.
- 4.3 The draft preferred options document (included at Appendix 1) sets out a positive strategy to provide these additional homes using 'a new infrastructure-led approach, with a focus on sustainable locations, wherever possible'. This preferred approach has been developed to reflect as far as possible the feedback the Council received from the issues and options consultation about locating development in the most sustainable settlements, the desire to spread development as much as possible, and the desire to achieve infrastructure alongside homes.
- 4.4 The preferred option for providing additional homes through the Partial Review can be summarised as follows, with further details set out in the draft Preferred Options document:

Settlement extensions	Approximate number of homes
Wool	1,000
Lytchett Minster	650
Wareham Town	500
Moreton Station	350
Lytchett Matravers	330
North Wareham	205
Upton	100
Langton Matravers	40
Harmans Cross	20
Total	3,195

- 4.5 Infrastructure improvements, such as schools and highways improvements, will need to be delivered alongside the housing, and more details about this are provided in the draft preferred options document.
- 4.6 The preferred option provides for 3,195 homes, which is a surplus of around 4% over the objectively assessed housing need identified in the SHMA. This surplus will provide useful contingency, to help ensure that the Council can maintain a supply of housing and not risk under-delivery and the associated problems with speculative planning applications (planning by appeal).
- 4.7 In addition to the proposed preferred option for housing, the draft consultation document also includes proposals relating to the following topics:
- Heathland mitigation: The Council commissioned the 'Purbeck Heathlands Report' (attached as **Appendix 2**) to explore potential alternatives to the current policy approach which does not allow residential development within 400m of protected heathlands, and which requires mitigation for development between 400m and 5km of the heaths. Based on the findings of the Purbeck Heathlands Report, officers

recommend that the Council continues with its current policy approach, but with flexibility to explore alternatives to Suitable Alternative Natural Greenspace (SANGs) in cases where SANGs are not deliverable.

- Affordable housing delivery: The Council commissioned a viability study to inform the Partial Review, which looked at the Council's affordable housing policy and tenure mix requirements. Based on the findings of the viability study and experience to date in securing affordable housing on small sites, officers recommend a new approach to affordable housing requirements, as set out within the preferred options document in Appendix 1.
- Self-build: The Council set up a self / custom build register in early 2016, and so far nearly 60 households have registered an interest for a plot. In order to help address this demand, officers recommend that the Council should introduce a new requirement for sites of 20 or more units to provide an allowance for 5% self-build housing.
- Housing mix: Officers recommend that the Council introduces a new policy relating to housing mix. The proposed policy is included in Appendix 1, and sets out that the Council would generally expect new affordable and market housing to follow the mixes cited in the Eastern Dorset SHMA. The proposed policy also sets out that, for sites delivering 20 or more units, 10% of the overall mix should be bungalows; and for sites of 100 or more homes, 20% of the overall mix should be C3 specialist accommodation for older people.
- Morden Country Park: During the Partial Review Issues and Options consultation, the Council consulted on proposals to provide significant public open space at Morden and include tourist accommodation of around 80-100 chalet / forest lodge units in order to make the scheme viable. Officers recommend that the Council supports this proposal, subject to finding an appropriate delivery mechanism for the public open space, which would act as a strategic SANG. A map of the site will be added to the draft Consultation Document for the Council papers.
- Review of existing policies and proposed new policies: Officers are recommending a number of changes to existing PLP1 policies, and some new policies to cover Coastal Change Management Areas, occupational dwellings in the countryside, and sustainable drainage systems. The proposals for new and revised policies are summarised in Appendix 1, with further detail on the revised policies set out in the Revised Planning Policies Background Paper (attached at **Appendix 3**).

4.8 In addition to the above, officers will provide a verbal update at the Partial Review Advisory Group meeting, and full text will be provided in the Council papers, in regard to the following matters:

- Employment: During the issues and options consultation, the Council sought views on eight potential employment sites located across the district. This section of the Preferred Options document will set out the Council's proposed approach to these sites, in terms of whether or not they should be taken forward as employment allocations.

- Retail: The Poole and Purbeck Retail Study (2015) indicates that the Council may need to deliver an additional 600sqm (net) of food retail floor space, over and above the need identified in the PLP1. Officers are investigating whether this could be provided as local shops as part of the development schemes at the larger proposed housing sites, and will provide a verbal update on this at the Advisory Group meeting.
- Norden Park and Ride: During the issues and options consultation, the Council sought views on the potential expansion of the Norden Park and Ride. This section of the document will set out the Council's proposed approach to the expansion scheme, in terms of whether or not this should be allocated through the Partial Review.
- Gypsies, Travellers and Travelling Show People: There is a statutory duty on the Council to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. Evidence shows that Purbeck's current identified need is for 33 pitches during the period 2013 – 2028. To date, the Council has not found any deliverable sites in Purbeck, and officers are therefore drafting text for the Preferred Options consultation document to set out the options of providing an element of provision for Gypsies, Travellers and Travelling Showpeople on strategic housing sites, or using a criteria based policy to allow sites to come forward.
- Open Space: During the issues and options consultation, the Council sought views on how larger developments should provide open spaces such as sports pitches or children's play equipment. This section of the document will provide an update in regard to open space provision.

4.9 These matters are not covered in detail in the draft Preferred Options document (attached at Appendix 1) due to recent resourcing issues in the Planning Policy Team, including staff sickness and a vacant post. These resourcing issues have now been resolved, and draft text relating to the above matters will be included in the papers for consideration by Council in May.

4.10 Officers are proposing to publish the Preferred Options document for a 6 week period of public consultation in June and July 2016, subject to approval by Council in May. Officers propose that the consultation period should run from Thursday 9 June to Friday 22 July.

5. Resources

5.1 The consultation arrangements will include statutory advertisements in the local press, as well as distribution of an information flyer to every household in Purbeck, publicising the consultation.

5.2 All consultation material will be available to view online, and people will be encouraged to respond via the Council's new online consultation portal. Paper copies of the consultation document will be available from Purbeck District Council reception, town and parish councils and local libraries. A 'summary leaflet' will also be prepared, to highlight the key messages of the consultation document.

5.3 Officers are proposing to run consultation events in key affected parishes during the first 3 weeks of the consultation, and will be seeking to work with town and parish councils to

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agree the most appropriate format for these events. At present, officers are proposing that events will take place in Moreton, Wareham, Lytchett Matravers, Langton Matravers, Lytchett Minster, Swanage and Wool.

- 5.4 Approximate costs for the consultation are set out in the table below. These costs are approximate and figures may change depending on the detailed consultation plans. All costs will be met from the existing planning policy budget.

Item	Approximate cost
Statutory advertisements in local press x 2	£500
Consultation flyers – print and distribution	Up to £3,500 depending on size of flyer
Drop-in events / workshops room hire	£600
Swanage & Wareham Advertiser – quarter page advert	£300
Purbeck Gazette – full page advert	£650
‘Summary leaflet’ – print 1,000 copies of 12 page booklet	£100 (internal recharge)
Consultation material – print hard copies for distribution to town and parish councils and libraries	£200 (internal recharge)
Total estimated cost	Up to £5,850

Appendices:

- 1 - Draft Partial Review Preferred Options consultation document**
- 2 - Purbeck Heathlands Report**
- 3 – Revised Planning Policies Background Paper**

For further information contact:-

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**Purbeck Local Plan Examination
Hearing Statement on behalf of Wyatt Homes
(Respondent: 1190024)**

Matter B – Housing Need and Requirement

June 2019



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Client

Wyatt Homes

Our reference

WYAW3012, WYAW3013 and WYAW3014

June 2019

1. Introduction

- 1.1 This statement is submitted on behalf of Wyatt Homes (Respondent ref: 1190024) to the Purbeck Local Plan Examination. It responds to the Issues and Questions outlined under '*Matter B – Housing Need and Requirement*'.
- 1.2 This statement follows our representations submitted in December 2018 in response to the consultation held on the Purbeck Local Plan 2018 - 2034 Pre-Submission Draft (Ref SD01a). It should be noted that separate representations were made on behalf of Wyatt Homes in relation to a number of sites within what was then Purbeck District. The full list of representations and appendices submitted in December 2018 on behalf of respondent 1190024 is as follows:
- Representations in relation to Land East of Wareham Road, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Land East of Wareham Road
 - Representations in relation to Blaneys Corner and Sunnyside Farm, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Blaneys Corner and Sunnyside Farm
 - Appendix 2: Blaneys Corner – Landscape and Green Belt Study by HDA
 - Appendix 3: Sunnyside Farm – Landscape and Green Belt Study by HDA
 - Representations in relation to Land at Policemans Lane and Frenches Farm, Upton:
 - Appendix 1: Delivery Framework Document for Land at Policemans Lane
 - Appendix 2: SHLAA Consultation Response in relation to Frenches Farm, Upton
- 1.3 This statement is prepared in support of all of the above representations. However, we have not considered it necessary to address every Issue or question set by the Inspector. Therefore, the responses provided in Section 2 of this Statement cover only those areas where Wyatt Homes consider a response is required to support or elaborate on their original representations.

2. Response to Issues and Questions – Matter B

Issue 1: Housing Need and Requirement (Policy H1)

Question 3 -The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

3(a) Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?

- 2.1 The need for an uplift in the housing requirements to take account of anticipated employment growth is no longer specifically required by Planning Practice Guidance. Nevertheless, we consider that, in the context of the ambitious plans for the Dorset Innovation Park (Enterprise Zone) at Winfrith and further development at Holton Heath Trading Park, this is a factor that should be taken into account in determining the overall housing target for the local plan. We consider that this would be consistent with the potential circumstances allowed for by paragraph 10 of the Planning Practice Guidance.¹
- 2.2 The 2018 Strategic Housing Market Assessment (SHMA) Update (Ref: SD20) considered and economic-led assessment of housing needs. This considered the impact of three econometric forecasts which are described at paragraph 3.7 of SD20 and referred to thereafter as the ‘Baseline’, ‘Trend’ and ‘Strategy’ scenarios.
- 2.3 The analysis shows that, under the ‘Baseline’ scenario, the number of projected additional jobs (2013-2033) is the lowest when one looks at the whole of the East Dorset area used. However, when disaggregated, this scenario results in the highest projected level of employment growth for the Purbeck area. Conversely, the ‘Trend’ and ‘Strategy’ scenarios result in a higher level of forecast jobs growth for Eastern Dorset but a lower level for Purbeck, when the total is disaggregated.²
- 2.4 Following further analysis, the SHMA Update concludes that, for Purbeck, the ‘Trend’ and ‘Strategy’ scenarios would each result in an economic-led housing need of between 151 and 157 dwellings per annum, i.e. below the demographic-based ‘local housing need’ calculation. However, the ‘Baseline’ scenario would result in an economic-led need of between 185 and 192 dwellings per annum, which is well above the proposed housing target within the local plan.
- 2.5 Whilst we have not undertaken our own analysis, a number of issues clearly arise from the analysis within the SHMA Update. First, whilst we accept that the number of jobs that are anticipated to be achieved by the Dorset Innovation Park are fewer than was originally forecast, the overall level of jobs growth forecast for Purbeck, under the ‘Trend’ and ‘Strategy’ scenarios, appears to us to underestimate the combined total of additional employment that could be achieved if all of the planned employment

¹ PPG Reference ID: 2a-010-20190220

² SD20: Table 8

development set out within Policy EE1 of the local plan comes forward as anticipated. The difference between the economic-led housing need for Purbeck under the 'Trend' and 'Strategy' scenarios and the proposed housing target is only between 11 and 17 dwellings per year, which is a narrow margin for error.

- 2.6 Second, following further scrutiny at the Local Plan Examination, if it is considered that the 'Trend' and 'Strategy' economic scenarios are indeed the most appropriate for the Council to rely on in setting its overall housing target within the local plan, it will be vital for account to be taken of the impact of these economic scenarios on the economic-led housing need within other parts of Eastern Dorset, beyond Purbeck. These locally generated scenarios result in significantly higher levels of forecast jobs growth across the wider Eastern Dorset area compared to the 'Baseline' scenario. Thus, if the 'Trend' and 'Strategy' scenarios are indeed the most appropriate, how will the elevated economic-led housing need arising from other parts of Eastern Dorset be accommodated, particularly in the period before the Dorset and BCP unitary local plans can be adopted in 2024?

3(b) Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard methodology to calculate housing need?

- 2.7 Yes. We consider that there is a case for some additional flexibility, in the form of a proportionate uplift in the overall housing target for the Purbeck Local Plan, justified by the anticipated employment growth within Eastern Dorset, both within Purbeck and beyond this area.
- 2.8 As we set out within our statement on Matter A in relation to the Duty to Co-operate, we also consider that there is a case for some uplift in the overall housing target to allow the Purbeck Local Plan to make a meaningful contribution towards meeting the unmet housing needs arising from within BCP local authority area in particular. We have elaborated further on this below at Question 5.

Question 4 - Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?

- 2.9 In order to inform the preparation of the Purbeck Local Plan, the Council commissioned an Environmental and infrastructure capacity study (EICS) which was completed in October 2017 (Ref: SD16). This was a relatively comprehensive study and it demonstrated that whilst there are areas within Purbeck that are highly constrained for environmental or infrastructure deficit reasons, there are equally a number of areas where there are fewer constraints and where, subject to appropriate mitigation, development could be appropriately accommodated.
- 2.10 In terms of the overall level of development that the Purbeck area would be able to accommodate, the EICS provided a very wide range from 550 to 4,350 dwellings. Given such a wide range one could reasonably look at the mid-point to consider where, on the law of averages, the overall total might be. We consider that this 'mid-point figure' would be in the region of 2,450 dwellings. Whilst this is 238 dwellings below what the local plan is proposing in Policy H1, it is important to understand that EICS capacity range represented a total capacity prior to the application of necessary mitigation.

Therefore, it is also reasonable to assume that the total capacity figure *including* appropriate mitigation secured through the local plan policies would be higher than the mid-point figure quoted above, and in all probability higher than the total number of dwellings proposed by the Council.

- 2.11 Whilst we accept that there can be no absolute certainty on the basis of the EICS evidence, we argue that the Council’s evidence base is sufficient to conclude that that the overall housing requirement does not need to be constrained below the figure derived from the application of the standard methodology. Further, we consider that a modest uplift in the total number of dwellings proposed in Policy H1 (for example in the region of 10 per cent), could also be accommodated within the local plan without undermining the spatial strategy or risking any significant exceedance of the area’s overall environmental and infrastructure capacity as tested on a district-level by the EICS.³

Question 5 - Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?

- 2.12 Within our statement on the Duty to Co-operate within Matter A, we set out our view on what the SoCG (SD10a) shows and the consequences of this for the Purbeck Local Plan.

- 2.13 In addressing this question, we would point to two key sources of evidence which clearly demonstrate first, that there is currently a significant level of unmet housing need in other parts of the Eastern Dorset HMA and second that, for some areas (for example the Christchurch area of BCP), there is limited prospect that the future housing requirements will be possible to deliver within those areas.

Housing Delivery Test 2018

- 2.14 In terms of the latest evidence of housing delivery failure across Eastern Dorset as a measure of the current level of unmet housing need, we point to the Housing Delivery Test (HDT) outcomes that were published by the Government on 19th February 2019. The table below shows the HDT position for the Eastern Dorset HMA:

Table 2.1: Housing Delivery Test 2018 - Results for the Eastern Dorset HMA

Area	Total Requirement (2015-2018)	No. Homes Delivered (2015 – 2018)	HDT 2018 Measurement
Bournemouth	2,353	1,970	84%
Christchurch and East Dorset (combined area)	1,528	1,141	75%

³ To quantify this point, a 10% uplift of the proposed total housing delivery set out within Policy H1 would result in a total supply over the plan period of 2,957 dwellings, which is 507 more than the mid-point of the *pre-mitigation* capacity range identified within the EICS.

North Dorset	638	521	82%
Poole	1,872	1,276	68%
Purbeck	337	445	132%
TOTAL	6,728	5,353	80%

- 2.15 Table 2.1 above indicates clearly that whilst Purbeck itself has exceeded its housing requirement in the 2015 to 2018 period covered by HDT 2018, each of the other Eastern Dorset HMA areas have failed to deliver sufficient homes to meet their requirements with a total unmet requirement of 1,375 dwellings across the HMA within just the three years included within the HDT.
- 2.16 The evidence of the HDT 2018 demonstrates that the SoCG was correct to point to the significant level of housing delivery failure across Eastern Dorset in particular.⁴ When one considers recent significant housing delivery failure in the context of the starkly increased future housing requirements across the HMA (deriving from adoption of the standard methodology) and the prospect of a five year wait until the adoption of the two unitary area local plans, it is clear that there is a case for the Purbeck Local Plan to make at least a meaningful contribution towards alleviating this problem. If this opportunity is lost it will only serve to exacerbate the problem for the two unitary area local plans and will unnecessarily defer efforts to resolve this key strategic challenge for Eastern Dorset. We consider that this outcome would fail to be consistent with national policy and would limit the effectiveness of Purbeck Local Plan.

Christchurch Local Plan Options Document (July 2018)

- 2.17 As a clear indication of the challenges faced by other parts of the Eastern Dorset HMA in meeting future housing requirements, we would highlight the example of the Christchurch Local Plan Options Document that was published in July 2018 and subjected to public consultation under Regulation 18. This consultation document used the standard methodology to calculate a proposed housing requirement for the purposes of the consultation, which amounted to 7,040 dwellings to be delivered in the period 2013 to 2033. However, even following considerable work to identify suitable housing sites ahead of publishing the consultation document, the conclusion was that only some 5,270 dwellings could be accommodated within the Christchurch Borough area by 2033. This represented a shortfall of 1,770 dwellings.
- 2.18 In coming to these conclusions, Christchurch Borough Council had already assessed their Green Belt areas and a number of Green Belt sites, that were considered appropriate for release from the designation, were already proposed for potential allocation as housing sites within the emerging local plan. In response, to the likelihood that the local plan would not be able to meet all of the Borough’s housing need, the consultation document stated:

“As part of the Duty to Co-operate process the Council is engaging with neighbouring authorities regarding options for the delivery of further housing

⁴ SD10a: Paragraph 18

options to address the full objectively assessed housing need for Christchurch based on the Government's latest methodology.”⁵

- 2.19 Christchurch is now a part of the BCP unitary authority area and the Christchurch Local Plan will no longer be taken forward, in favour of the BCP unitary area local plan. However, given that Bournemouth and Poole also have high future housing requirements and tightly drawn boundaries within which it will be very challenging and likely impossible to meet their future housing requirements, we consider it highly likely that BCP Council will need to reach an agreement with Dorset Council and possibly other local authorities, over how their unmet needs can be appropriately addressed.
- 2.20 Again, it would limit the effectiveness of the plan to defer this process of addressing the unmet housing needs until the two unitary area local plans emerge. The Purbeck Local Plan provides a valuable opportunity to make at least some contribution towards meeting this need now, rather than unnecessarily postponing this for the next four or five years.

⁵ Christchurch Local Plan Options Documents (July 2018): paragraph 3.2.17

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Examination of the Purbeck Local Plan

Further statements based on Inspector’s Matters, Issues and Questions

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

MATTER B: Housing Need and Requirement

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Issue 1: Housing Need and Requirement (Policy H1)

Q6. Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in paragraph 65 of the Framework?

1. Although the Council’s intent to work with each of the existing, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area is welcomed as a clear sign of intended co-operation, it leaves uncertainty for the Neighbourhood Plan examination which creates potential challenges from objectors and further unnecessary work for Neighbourhood Plan Groups.
2. Paragraph 65 of the NPPF makes clear that strategic policy-making authorities (ie Purbeck District Council as was, and now Dorset Council) should establish a housing requirement figure for their whole area, and *Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³⁰.*
3. One exception envisaged (under footnote 30) relates to a high-level joint plan that would provide a framework for strategic policies at the individual local authority level – which is clearly not the case here.
4. Paragraph 66 does consider where setting a housing requirement for a Neighbourhood Plan area “may not be possible”, but the circumstances for this is set out in footnote 31, which states

Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date

which is clearly not the case here.

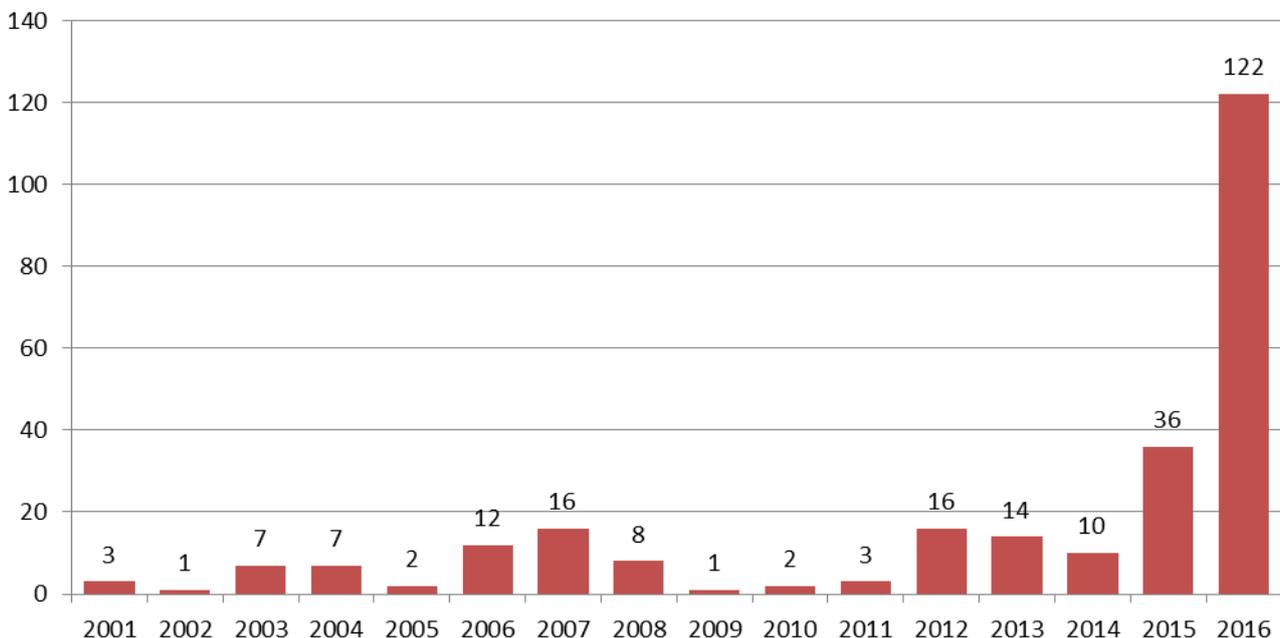
5. Purbeck District Council provided the Wareham Neighbourhood Plan Steering Group written confirmation of the housing requirement figures in September 2018. The District Council confirmed that the housing requirement was 300 dwellings. The letter is reproduced in **Appendix 1**.
6. The most recent guidance in the NPPG (Reference ID: 41-101-20190509) advises how this figure may be calculated, which includes:

taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area

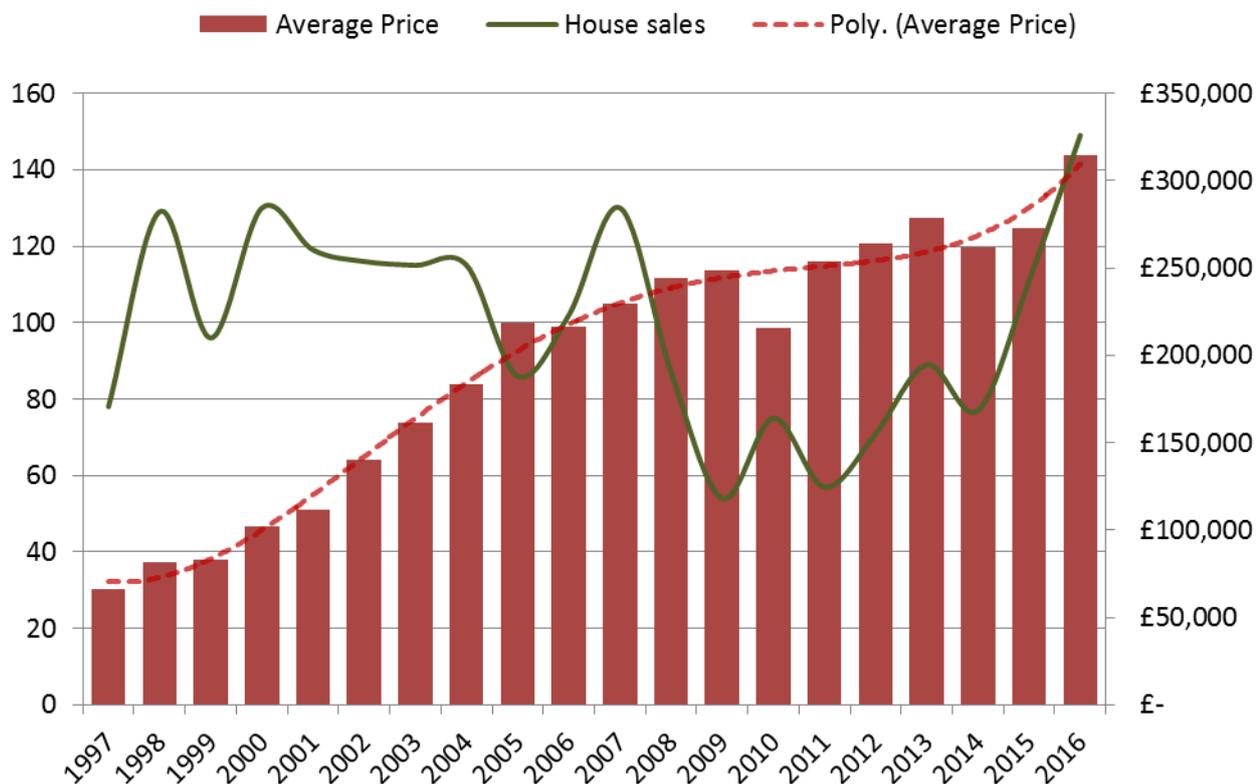
the guidance continues (Reference ID: 41-102-20190509)

They can use the authority’s local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.

7. A simple calculation of the ‘pro-rata’ number of houses based on the number of dwellings recorded in the 2011 Census (2,933 / 23,126) would suggest a 12.68% ‘share’ of the housing growth. Based on the 168dpa this would make a requirement of 21dpa for Wareham for the 15 period 2018-2034 – 320 dwellings in total. This factors in the existing balance between town and country, but does not take into account other factors such as planning constraints (AONB, Green Belt, wildlife sites etc) and available land supply.
8. During the preparation of the Neighbourhood Plan some housing data was collated, including past build rates (as shown below). This indicates that the Neighbourhood Plan area struggled to deliver 21dpa until the major site at Worgret Road was granted planning permission. The mean average (including the 2017-18 figure of 46 completions) equates to 18dpa (or 270 dwellings over a 15 year period)



9. Land Registry data on house sales that was also extracted at that time does not indicate any clear correlation that would suggest a lack of new homes was pushing up house prices – as after 2005 house prices have remained relatively stagnant even with few house sales. The house building boom in 2015/16 did not reduce house prices.



10. On this basis, and given the Wareham Neighbourhood Plan’s proposals to deliver the 300 homes that the Local Plan anticipates, a figure of 300 dwellings is considered to be appropriate housing target for the Wareham Neighbourhood Plan area. The Wareham Neighbourhood Plan group would therefore welcome this being specified in the Local Plan, provided that the Neighbourhood Plan is enabled to amend the Green Belt boundary.

Appendix 1 – Purbeck District Council confirmation of Wareham NP Housing Requirement (redacted)

Your Ref

Our Ref: SEM/arp

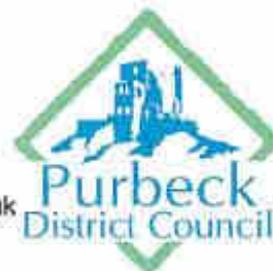
Please ask for

Date: 11 September 2018



BY: Direct Tel No: (01929) 557235

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Cllr K Critchley
Chairman of the Wareham Neighbourhood
Planning Group
Town Hall
Wareham
BH20 4NS

Dear Cllr Critchley,

I am writing to inform you of the Council's intention to set some strategic policies in the Purbeck Local Plan which will impact on the local policies in the Wareham Neighbourhood Plan. These intentions will be reflected in the pre-submission draft of the local plan that is to be considered at the 19th September policy group and then Council meeting on 9th October, with the recommendation that the Council process with the statutory 6-week publication of its pre-submission plan.

In line with the recent changes to the NPPF (paragraph 65 and 66), I am writing to confirm that the housing requirement figure for the Wareham Neighbourhood Plan area is 300. This figure includes allocations outside the existing settlement boundary as well as allocations inside the existing settlement boundary and other windfall. I also confirm that the Purbeck Local Plan intends to make some changes to green belt boundaries. In Wareham, in accordance with paragraph 136 of the NPPF, the Purbeck Local Plan will establish a need for a change to the green belt boundary with the detailed amendments to be made by the Wareham Neighbourhood Plan. Accompanying changes to the settlement boundary will also need to be made by the Wareham Neighbourhood Plan.

I would like to take this opportunity to wish the Wareham Neighbourhood Plan group well with its continued development of its plan.

Yours sincerely



Steve Mackenzie
Chief Executive



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