

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

Contents

1. Introduction.....	3
2. Assessing Housing Need Using the Standard Method.....	3
3. Seeking to Meet the Updated Figure for Local Housing Need from the Standard Method.....	3
4. Seeking to Meet the Updated Uncapped Figure for Local Housing Need from the Standard Method.....	4
5. Possible Higher Levels of Housing Need	4
6. Concerns about the Possible Increases the Housing Need Figure	6
Affordable Housing Need.....	6
Local Economic Aspirations.....	7
Unmet Need from Neighbouring Authorities	7
7. The Distribution of Growth in the Submitted Purbeck Local Plan	9
8. Options for Meeting Increased Housing Numbers from the Allocation of Additional Sites.....	12
Options at the Three Towns.....	12
Options at the ‘Lower Order Settlements’	15
Key Service Villages	15
Local Service Villages	16
Other Villages with a Settlement Boundary.....	16
9. Increasing Housing Numbers to 200 dpa: Implications for the Spatial Strategy	18
10. Increasing Housing Numbers to 228 dpa: Implications for the Spatial Strategy	19
11. Conclusions	19

List of tables

Table 1: Additional Homes Required to meet the Updated Standard Method Figures	3
Table 2: Meeting Updated Standard Method Figures from the Revised Assessment of Housing Supply.....	4
Table 3: Meeting Updated Uncapped Standard Method Figures from the Revised Assessment of Housing Supply.....	4

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

Table 4: Additional Homes Required Above the Level in the Submitted Local Plan under Different Housing Need Scenarios	5
Table 5: Additional Housing Provision Required Above the Revised Housing Supply Under Different Housing Need Scenarios	6
Table 6: Proposed Distribution of Housing Growth against the Settlement Hierarchy in the Submitted (2019) Purbeck Local Plan	10
Table 7: Proposed Distribution of Housing Growth against the Settlement Hierarchy in the Adopted (2012) Purbeck Local Plan	11
Table 8: Maximum (Gross) Capacity of Option Sites Identified in the 2016 Options Consultation Document	15
Table 8: Residual Capacity of Option Sites Identified in the 2016 Options Consultation Document.....	17

List of maps

Map 1: Housing Market Areas in the New Forest.....	9
--	---

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

1. Introduction

- 1.1 At the first hearing sessions for the examination of the Purbeck Local Plan, the Inspector indicated that thought should be given to the implications of any increase in housing numbers on the spatial strategy in the Purbeck Local Plan.
- 1.2 Increases in housing numbers could be derived from:
 - the figures used in the application of the ‘standard method’ in national planning guidance to identify ‘a minimum annual housing need figure’ for Purbeck; or
 - circumstances which might make it appropriate to plan for a higher housing need figure than the standard method indicates.
- 1.3 This paper sets out the housing need figures derived from the different scenarios discussed at the hearings and considers the implications of seeking to meet these figures for the spatial strategy in the Purbeck Local Plan.

2. Assessing Housing Need Using the Standard Method

- 2.1 The submitted Purbeck Local Plan indicates that the minimum annual housing need figure for Purbeck is 168 dwellings per annum (dpa). However, following discussions at the hearings, the Inspector expressed the view that using the most up-to-date information at the time of submission would result in a minimum annual local housing need figure of 180 dpa.
- 2.2 Dorset Council accepts that the standard method establishes a minimum annual housing need figure for Purbeck of 180 dpa and that, as a minimum, the council should aim to make provision for this level of need in the Purbeck Local Plan. In the event that the local housing need figure was increased to 180 dpa, the Purbeck Local Plan would need to make provision for an additional 192 homes over the plan period, as set out in Table 1 below.

Scenario	Local housing need (dpa)	Housing provision figure (2018 to 2034)	Additional homes required
Submitted local plan (capped 40% uplift for affordability)	168	2,688	0
Standard method (updated) (capped 40% uplift for affordability)	180	2,880	+192

Table 1: Additional Homes Required to meet the Updated Standard Method Figures

3. Seeking to Meet the Updated Figure for Local Housing Need from the Standard Method

- 3.1 A review of sources of housing supply in Purbeck has been undertaken and is available separately. The review includes: a re-assessment of the overall supply (ref: SD86); a re-assessment of the five-year housing land supply (ref: SD87); and a re-

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

assessment of the capacity of sites that could come forward under Policy H8: Small Sites (ref: SD88). The review shows that there is an overall supply of 3,062 dwellings over the plan period. Table 2 below shows that the revised housing supply exceeds the updated 'local housing need' figure of 180 dpa (2,880 homes) by 182 dwellings.

Updated local housing need figure (dpa)	Revised housing provision figure (2018 to 2034)	Revised housing supply	Housing supply above revised provision figure
180	2,880	3,062	+182

Table 2: Meeting Updated Standard Method Figures from the Revised Assessment of Housing Supply

- 3.2 This means that a housing provision figure based on the updated standard method figures (180 dpa) would not have any implications for the spatial strategy in the local plan because the figure could be met from the (revised) sources of housing supply already identified.

4. Seeking to Meet the Updated Uncapped Figure for Local Housing Need from the Standard Method

- 4.1 Dorset Council accepts that in relation to affordability, the actual level of need is higher than the figure indicated by the standard method, because the application of the 'cap' reduces the figure from 185 to 180 dpa.
- 4.2 The overall supply of 3,062 dwellings identified in the review of sources of housing supply would enable the uncapped figure for housing need to be met from the revised housing supply, as shown in Table 3 below.

Uncapped local housing need figure (dpa)	Revised housing provision figure (2018 to 2034)	Revised housing supply	Housing supply above revised provision figure
185	2,960	3,062	+102

Table 3: Meeting Updated Uncapped Standard Method Figures from the Revised Assessment of Housing Supply

- 4.3 This means that a housing provision figure based on the updated uncapped standard method figure (185 dpa) would not have any implications for the spatial strategy in the local plan because the figure could be met from the (revised) sources of housing supply already identified.

5. Possible Higher Levels of Housing Need

- 5.1 Some participants at the hearing sessions pointed to the high level of need for affordable housing in Purbeck and suggested that an uplift of about 20 dpa (to 200 dpa) should be considered. Some participants expressed the view that the uplift was also required to ensure there was a sufficient workforce to meet the council's economic development aspirations.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

- 5.2 An additional uplift (to 228 dpa) was suggested by participants as a means of addressing a proportion of the possible shortfall in provision from neighbouring authorities to the east of the Purbeck area. Whilst acknowledging that the overall level of unmet housing was, at present unknown, participants argued that it would be appropriate to consider an uplift to 228 dpa as a proportionate response to the evidence of housing provision shortfalls in Christchurch, New Forest District and the New Forest National Park.
- 5.3 In the event that the local housing need figure was increased to 200 dpa, the submitted Purbeck Local Plan would need to make provision for an additional 512 homes over the plan period. In the event that the local housing need figure was increased to 228 dpa, provision would need to be made for an additional 960 homes over the plan period, as set out in Table 4 below.

Scenario	Housing requirement (dpa)	Housing provision figure (2018 to 2034)	Additional homes required
Submitted local plan	168	2,688	0
Standard methodology (updated)	180	2,880	+192
Updated uncapped standard methodology figures	185	2,960	+272
Plus meeting some additional affordable housing need and economic aspirations uplift	200	3,200	+512
Plus meeting some unmet need from neighbouring authorities	228	3,648	+960

Table 4: Additional Homes Required Above the Level in the Submitted Local Plan under Different Housing Need Scenarios

- 5.4 If the results of the review of sources of housing supply are taken into account, however, the level of additional housing provision required is less than that set out in Table 4. A housing need figure aimed at meeting some affordable housing need and the economic aspirations for Purbeck (as perceived by participants at the hearing: 200 dpa) would exceed the revised housing supply from existing sources by 138 dwellings. A housing requirement aimed at also meeting some unmet need from neighbouring areas (as perceived by participants at the hearing: 228 dpa) would exceed the revised housing supply from existing sources by 586 dwellings, as set out in Table 5 below.

Scenario	Housing requirement (dpa)	Housing provision figure (2018 to 2034)	Revised housing supply	Housing provision above supply
----------	---------------------------	---	------------------------	--------------------------------

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

Updated standard methodology figures	180	2,880	3,062	+182
Updated uncapped standard methodology figures	185	2,960	3,062	+102
Plus meeting some affordable housing need and economic aspirations	200	3,200	3,062	-138
Plus meeting some unmet need	228	3,648	3,062	-586

Table 5: Additional Housing Provision Required Above the Revised Housing Supply Under Different Housing Need Scenarios

- 5.5 In either scenario additional housing allocations would be required to meet either revised housing need figure. At 200 dpa additional provision would need to be about 140 additional homes. At 228 dpa additional provision would need to be in the order of 590 additional homes. Either scenario would have implications for the spatial strategy in the Purbeck Local Plan, which are discussed later.

6. Concerns about the Possible Increases the Housing Need Figure

- 6.1 Dorset Council has concerns about the reasoning put forward by some participants for increasing housing numbers above the figure for local housing need derived from the standard method. These concerns are outlined below.

Affordable Housing Need

- 6.2 At the hearing participants suggested that it may be appropriate to increase the level of provision (to about 200 dpa) to address some affordable housing need and the council's economic aspirations.
- 6.3 The standard methodology includes an adjustment to take account of affordability, based on the ratio between house prices and workplace-based earnings. The affordability adjustment will deliver 40% more homes than would be required to meet household growth projections and a proportion of these will be affordable homes, in accordance with Policy H11. The application of the standard methodology will, therefore, directly contribute to a higher level of affordable housing provision.
- 6.4 National planning guidance indicates that a cap may be applied in cases where the uplift resulting from the application of the affordability ratio is particularly high, as is the case in Purbeck. Paragraph 2a-077-20190202 explains that *'the cap is applied to ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible'*. Paragraph 2a-077-20190202 states that *'strategic policies adopted with a cap applied may require an early review.'* The Purbeck Local Plan will be the subject of an early review (as suggested in national

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

guidance) in any event, through the preparation of the Dorset Local Plan, which is already underway.

- 6.5 The proposed policy framework in the Purbeck Local Plan includes policies, which would enable affordable homes to be delivered on sites that are not allocated for development and / or which lie outside settlement boundaries. The small sites policy (Policy H8) and the rural exceptions policy (Policy H12) both provide mechanisms to increase the delivery of affordable housing without increasing housing numbers in the local plan.
- 6.6 For these reasons it is not considered appropriate to increase the level of housing provision further in the Purbeck Local Plan to address affordable housing need.

Local Economic Aspirations

- 6.7 The 2016 workspace strategy identified a need for 11.5 hectares of employment land for Purbeck, but the table in Policy EE1 makes provision for 47 hectares across the local plan area. This has been reduced to 45.4 hectares in the schedule of possible modifications. On the face of it, this could be interpreted as the former Purbeck District seeking to significantly boost economic growth in its area, which might require a significant additional workforce, for which additional housing provision should be made. However, this is not the case.
- 6.8 The table in Policy EE1 clearly sets out that the vast majority of employment land provision is at two 'strategic employment sites' with 40 (38.4 in the possible modifications schedule) hectares proposed at Dorset Innovation Park and 5.7 hectares proposed at Holton Heath Trading Park.
- 6.9 Paragraph 203 in the local plan explains '*Purbeck is unique in having its strategic employment sites located at the Western (Dorset Innovation Park) and Eastern (Holton Heath) edges of the District, within the Eastern Dorset HMA. Many of the Holton Heath businesses have a workforce that is largely resident in the conurbation. Dorset Innovation Park is in the western edge of the District and will act as a hub for south Dorset with significant in-commuting from adjoining settlements which has traditionally always been the case for the site. The longer and higher than normal level of in-commuting to the Dorset Innovation Park is partly as a result of the specialist skills required.*'
- 6.10 Given the wider, more strategic role and function of these employment sites, which support the economies of the Bournemouth / Poole conurbation and Dorchester / Weymouth, it would not be appropriate to make provision for additional housing to meet the purely local economic aspirations of the former Purbeck District. Also in relation to Dorset Innovation Park it should be borne in mind that 500 homes are allocated at nearby Crossways in the adopted West Dorset, Weymouth & Portland Local Plan. This increases to 1,114 homes under proposals in the Preferred Options for the West Dorset, Weymouth & Portland Local Plan Review.

Unmet Need from Neighbouring Authorities

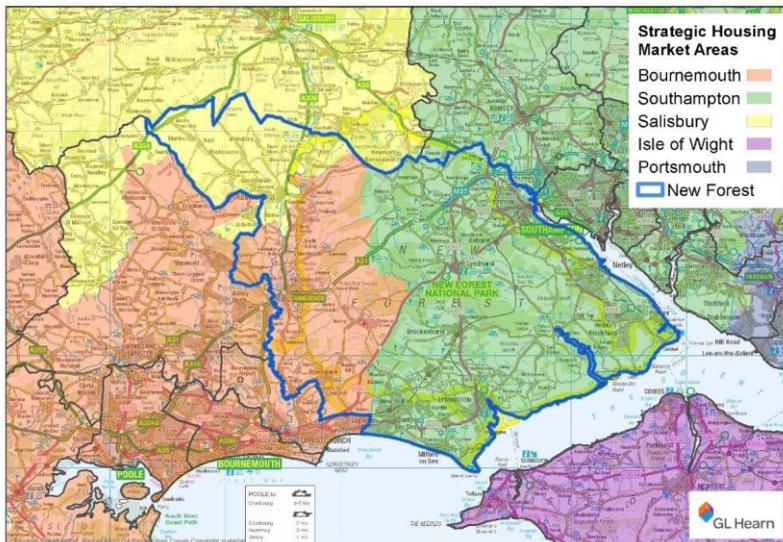
- 6.11 At the hearing the issue of unmet need from neighbouring authorities was discussed. In short, whilst there is likely to be some unmet need from the area now covered by

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

Bournemouth, Christchurch and Poole Council, the level of unmet need is (as yet), unknown.

- 6.12 Some indication of the level of unmet need in Christchurch can be obtained from the Options Consultation Document for the Christchurch Local Plan Review, which indicates an unmet need of 1,768 dwellings for the period up to 2033 (based on data available at the time of publication: July 2018).
- 6.13 At the hearings, it was recognised that there is also likely to be some unmet need from New Forest District (where the local plan review is currently at examination) and New Forest National Park. The participants at the hearing suggested a further uplift to about 228 dpa should be made to address a proportion of the likely unmet need, based primarily on the evidence of unmet need in the Christchurch and New Forest areas.
- 6.14 Dorset Council's view is that it is not appropriate to seek to meet an element of the unmet need from the Bournemouth, Christchurch and Poole and New Forest areas through the Purbeck Local Plan Review. It would be more appropriate to address this matter through the preparation of the Dorset Local Plan, which the council has committed to produce and adopt by April 2023, as set out in the Dorset Local Development Scheme approved in June 2019. The Bournemouth, Christchurch and Poole Local Plan is likely to be produced to a similar timetable, following the formation of both councils on 1 April 2019, providing a unique opportunity to address this issue strategically.
- 6.15 The figure of 228 dpa was derived from an equal apportionment of the unmet need between the relevant authorities. This 'fair share' approach is arbitrary, inappropriate and difficult to justify in sustainability appraisal terms.
- 6.16 As work on the Dorset Local Plan and the Bournemouth, Christchurch and Poole Local Plan gets underway a clearer view of the level of unmet need will emerge. Work on the two local plans will also include joint working on key areas of evidence, such as: transport (including measures needed to improve the A31); strategic green belt review (across both council areas); and the development of a strategy to provide mitigation for impacts on internationally important wildlife sites (including the Dorset heathlands and Poole Harbour).
- 6.17 It is unlikely that additional housing provision in Purbeck (to the west of the Bournemouth / Poole conurbation) would be very effective in meeting the need for housing in Christchurch (which lies to the east of the conurbation). The New Forest is also located on the other side of the conurbation and large parts of it falls within the Southampton and Salisbury HMAs (rather than the Bournemouth / Poole HMA), as evidenced in the SHMA produced by GL Hearn in 2014 and shown on the map below. It would clearly be more appropriate to seek to meet any unmet need from these parts of the New Forest within the Southampton and Salisbury HMAs, at least in the first instance.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need



Map 1: Housing Market Areas in the New Forest

- 6.18 A more strategic approach would enable a wider range of potential options to meet unmet housing needs across rural Dorset to be considered. Table 3.4 on Page 83 of the West Dorset, Weymouth & Portland Local Plan Preferred Options Document (published in August 2018) provides evidence that such potential options exist. It identifies a total supply of 19,016 dwellings against the local housing need (based on the standard methodology) of 15,880 units. This supply of 3,100 homes more than the local housing need figure could contribute to meeting unmet need.
- 6.19 A more strategic approach would also enable a wider range of options for accommodating growth within environmental constraints to be considered. This is particularly important in relation to internationally important wildlife sites (including the Dorset heathlands and Poole Harbour), as well as options both beyond and within the green belt.
- 6.20 The sustainability appraisal work undertaken to date on the Purbeck Local Plan is principally concerned with meeting the housing needs from the Purbeck area. If it is intended to meet unmet need from a wider area, it is difficult to see how the 'reasonable alternatives' could be properly assessed through the sustainability appraisal of the Purbeck Local Plan. This is particularly difficult given the incomplete evidence of unmet need (which relates only to Christchurch and the New Forest), the narrow focus of seeking to meet this unmet need solely in Purbeck (rather than across a wider area) and the arbitrary approach to apportioning the unmet need put forward by some participants.

7. The Distribution of Growth in the Submitted Purbeck Local Plan

- 7.1 Notwithstanding concerns about the possible increases in housing numbers, the council has considered how a higher level of need could be met, if justified. In order to understand the implications of increased housing numbers for the spatial strategy, it is first necessary to consider how it is proposed to distribute housing growth in the submitted local plan.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

7.2 Based on the re-worked housing supply, housing growth is proposed to be distributed against the settlement hierarchy as set out in the Table 6 below. 'Proposed growth' includes anticipated housing from permissions, allocations, neighbourhood plans and small sites. Completions (which have already been built) and windfall (based on past rates, rather than location) have been listed separately.

Proposed Housing Growth		
Location in the Settlement Hierarchy	Level of Proposed Growth	% of Proposed Growth
Towns	618	20.2
- <i>Swanage</i>	288	9.4
- <i>Upton</i>	111	3.6
- <i>Wareham</i>	219	7.2
Key Service Villages	1,349	44.1
Local Service Villages	124	4.0
Other Villages (with settlement boundaries)	31	1.0
Other Villages (without settlement boundaries)	55	1.8
Open Countryside	3	0.1
Total Proposed Growth	2,180	71.2
Other Sources		
Completions	73	2.4
Windfall	809	26.4
Total Overall Supply	3,062	100

Table 6: Proposed Distribution of Housing Growth against the Settlement Hierarchy in the Submitted (2019) Purbeck Local Plan

7.3 The figures in Table 6 include Moreton Station as a 'key service village'. It has been elevated to this level 'in recognition of the quantum of residential development and supporting infrastructure' proposed in the submitted plan. In the currently adopted (2012) local plan, Moreton Station has the status of 'other village with a settlement boundary'. The re-worked figures reflecting the settlement hierarchy in the currently adopted local plan are set out in Table 7 below.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

Proposed Housing Growth		
Location in the Settlement Hierarchy	Level of Proposed Growth	% of Proposed Growth
Towns	618	20.2
Key Service Villages	859	28.1
Local Service Villages	124	4.0
Other Villages (with settlement boundaries)	521	17.0
Other Villages (without settlement boundaries)	55	1.8
Open Countryside	3	0.1
Total Proposed Growth	2,180	71.2
Other Sources		
Completions	73	2.4
Windfall	809	26.4
Total Overall Supply	3,062	100

Table 7: Proposed Distribution of Housing Growth against the Settlement Hierarchy in the Adopted (2012) Purbeck Local Plan

- 7.4 The largest settlements in an area are usually considered to be the most sustainable, especially where they have a range of services and community facilities, as is the case with the three towns in Purbeck. However, only 20.2% of housing growth is proposed at the three main towns, reflecting the highly constrained nature of the land around them, as explained in Dorset Council's response to Matter D: The Strategy for Development. It should also be noted that windfall has been categorised separately in Tables 6 and 7, because it is based on past delivery rates, rather than location. As a result the figure of 20.2% does not include the windfall which is likely to come forward in the towns, which may be considerable.
- 7.5 Due to the constrained nature of the land around the towns, the 'spatial strategy' in Policy V1 proposes to focus a considerable proportion of housing growth at 'lower order settlements', particularly in locations that are less constrained and, in the case of Wool and Moreton Station, in locations that are served by the railway. Against the settlement hierarchy in the submitted local plan, 44.1% of housing growth is proposed at 'key service villages', including Moreton Station. However, if Moreton Station is categorised as an 'other village with a settlement boundary' (as defined in the adopted local plan), then 28.1% of housing growth (excluding completions in 2018/19 and windfall) is proposed at 'key service villages' with 17.0% proposed at 'other villages with a settlement boundary'.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

8. Options for Meeting Increased Housing Numbers from the Allocation of Additional Sites

- 8.1 At earlier stages of plan preparation consultation was undertaken on: 'issues and options' between January and March 2015; on 'options' between June and August 2016; and on 'new homes for Purbeck' between January and March 2018. In particular, the 2016 options consultation document sought to show how a higher level of housing need could be met. The Strategic Housing Market Assessment (SHMA) produced at the time identified a need for 238 dpa and although this identified level of need has since been superseded by the figures derived from the new standard method, the merits of a wider range of sites (than was included in the submitted local plan) have already been considered.
- 8.2 Local plans should be subject to sustainability appraisal. This requires the identification of 'reasonable alternatives' and their assessment against the environmental, social and economic objectives that contribute towards sustainable development. All of these earlier consultation documents were subject to sustainability appraisal, which focussed on the different development strategies for the distribution of growth to meet the identified need. It is considered that the starting point for the consideration of other possible allocations should be the sites identified in previous consultation documents, which have not been taken forward¹.

Options at the Three Towns

- 8.3 The 2016 options consultation document put forward one site at Upton, with an indicative capacity for about 100 dwellings. This is the site to the west of Watery Lane, which is proposed in Policy H7 of the submitted local plan for up to 90 dwellings. Upton is almost entirely surrounded by green belt. It is contained to the north and west by the A35 and large areas of land to the south of the town (adjoining Lytchett Bay) are at risk of coastal and tidal flooding. Large parts of the town are also within 400m of protected heaths. Due to these constraints, no other potentially suitable sites were identified adjoining the town in the 2016 options consultation document.
- 8.4 The 2016 options consultation document did not consider any sites at Swanage. This is because the Swanage Local Plan already allocates sites for 200 homes on the edge of the town. Because Swanage is covered by a separate local plan, the sustainability appraisal for the Purbeck Local Plan did not consider any sites at Swanage. Swanage lies entirely within the Dorset AONB and has a number of other constraints, including: flood risk along the Swan Brook and Ulwell Stream; coastal erosion; the Jurassic Coast World Heritage Site; and nationally and internationally important wildlife sites.
- 8.5 The 2016 options consultation document considered two sites at Wareham. The site at 'North Wareham' was identified as having capacity for about 205 homes and included land to the east and west of Bere Road. Land to the west of Bere Road is identified as having the capacity for about 60 dwellings in the regulation 16 version of

¹ The Council's decision on which sites to take forward have necessarily also been informed by key evidence around green belt, flood risk, European sites and other environmental constraints. This evidence has developed through consultations and over the preparation of the plan.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

the Wareham Neighbourhood Plan. The submitted local plan proposes a revision to the green belt and a change to the settlement boundary to accommodate development here, but there is no policy in Chapter 4: Housing, which allocates the site.

- 8.6 The site to the east of Bere Road, which the SHLAA shows has capacity for 136 homes (subject to the relocation of the allotments), was not taken forward in the submitted plan. Carter Jonas's submissions to the examination indicate that the site could accommodate 'up to 95 new homes'. This is an option (either including or excluding the allotments) that could be reconsidered, although there are significant issues with the site, including the impact on protected heathlands and the scope for mitigation.
- 8.7 The 2016 options consultation document also identified a site to the west of Wareham as having capacity for around 500 homes.
- 8.8 Land around Wareham is subject to a number of important constraints. The town is surrounded by either AONB (to the east and south of the town) or green belt (to the north, east and west, and between the northern and southern parts of the town). Wareham is also affected by significant areas of flood risk along the Rivers Frome and Piddle. Land to the east of the town is within 400m of protected heathlands. Due to these constraints, no other potentially suitable sites were identified adjoining the town in the 2016 options consultation document.
- 8.9 The number of options at the three towns that have been previously considered and subject to sustainability appraisal at earlier stages in the production of the Purbeck Local Plan is extremely limited. There are no options at Upton or Swanage and only three possible options at Wareham. The allocation of any of these sites at Wareham to increase housing numbers would require nationally recognised constraints to be breached.
- 8.10 The site to the west of Wareham lies entirely within the Dorset AONB. Paragraph 172 of the NPPF states that 'The scale and extent of development within these designated areas (including AONBs) should be limited.' It also states that 'planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'.
- 8.11 Dorset Council considers that there are no exceptional circumstances that would justify the allocation of this site and that to do so would not be in the public interest. The council has shown that the minimum annual housing need figure for Purbeck calculated under the standard method (180 dpa) can be met from the sources of supply already identified in the local plan. The allocation of the site would only be required to provide an uplift above this figure for local housing need calculated using the standard method and part of the uplift would be to meet unmet need from neighbouring areas.
- 8.12 The options for meeting higher levels of housing provision across Dorset as a whole (including unmet need from neighbouring areas) will be examined through the preparation of the Dorset Local Plan, which is already underway. There will therefore be scope, in the near future, to consider other options to meet any required uplift, including options outside the designated area. There are also concerns about the detrimental impact development to the west of Wareham would have on the

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

environment, including impacts on the landscape of the AONB, which could not be avoided or mitigated. The site is also physically separated from Wareham. The Worgret Road Roundabout and A351 provide physical barriers to access on foot / bicycle) and are relatively remote from the town centre facilities / services.

- 8.13 The site at North Wareham east of Bere Road lies entirely within the green belt. Paragraph 7.15 of the submitted Wareham Neighbourhood Plan refers to an analysis of the townscape character of north Wareham prepared by Matrix Partnership. Figure 38 on Page 42 of the neighbourhood plan shows this analysis. Much of this site is identified as 'high quality landscape adjacent to the town' which includes a 'minor scarp' immediately abutting the existing houses. Part of the site also forms Northmoor Park Allotments, which are identified as a Local Green Space (Site D) in Policy GS1 in the submitted neighbourhood plan.
- 8.14 In addition to impacts on the landscape and the potential loss of allotments, the proximity of the site to internationally important heathlands is also an issue. The site directly abuts the 400 metre zone around heathlands and there is direct access to Wareham Forest (and the heaths) from a public right of way nearby. Given this situation, Natural England has expressed concerns over whether it would be possible to mitigate against the potential recreational impacts.
- 8.15 The illustrative layout submitted in response to the pre-submission consultation (in December 2018) raises concerns about the suitability and capacity of the site. Replacement allotments are proposed on the 'north western spur' adjacent to the Bere Road. This location would be less accessible to residents on foot, on a steeply sloping site and likely to affect the setting of the barrows that form a Scheduled Monument at the top of the hill. Although this area would be free from built development, other features typical of allotments, such as parking, sheds, greenhouses, compost bins etc. would affect the setting. The illustrative layout also shows housing very close to an existing fairway on the edge of the golf course, potentially giving rise to safety concerns.
- 8.16 The site to the west of Bere Road, which is also located in the green belt, has been progressed through the Wareham Neighbourhood Plan and has community support. It is considered to be a better option to provide some additional housing development at North Wareham, as the topography enables the site to be satisfactorily integrated into the landscape and it is located well away from the 400 metre buffer around heathlands. The submitted local plan proposed releasing this site from the green belt however Wareham Neighbourhood Plan has since explored options for delivering their housing allocation at different sites that do not require releasing land from the green belt. They now propose allocating land at Westminster Road for 30 homes, Johns Road for 15 homes, the Wareham Middle School site for 90 homes, hospital site for 40 homes and the Gasworks site for 10 homes as well as Cottees which now has planning permission for 9 homes.
- 8.17 The council has shown that the minimum annual housing need figure for Purbeck calculated under the standard method (180 dpa) can be met from the sources of supply already identified in the local plan., The Council would need to reconsider housing supply if there is a requirement to provide an uplift above the figure for local

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

housing need calculated using the standard method and part of the uplift would be to meet unmet need from neighbouring areas.

- 8.18 The options for meeting higher levels of housing provision across Dorset as a whole (including unmet need from neighbouring areas) will be examined through the preparation of the Dorset Local Plan, which is already underway. As part of the preparation of this plan, it is likely that options both within and beyond the green belt will be considered. Any strategic review of the green belt will be able to consider a wider range of options to meet housing need in the Dorset Council area and any required uplift from neighbouring areas.

Options at the ‘Lower Order Settlements’

- 8.19 The maximum capacity of sites put forward in the 2016 options consultation document is set out in the table below, ordered according to their level in the settlement hierarchy.

Settlement	Capacity for Homes
Key Service Village	
Lytchett Matravers: North East	100
Lytchett Matravers: sites elsewhere	500
Wool	1,000
Local Service Village	
Langton Matravers	40
Other Village with a Settlement Boundary	
Harman’s Cross	20
Lytchett Minster	650
Moreton Station: Redbridge Pit	500
Moreton Station: North of Moreton Station	100

Table 8: Maximum (Gross) Capacity of Option Sites Identified in the 2016 Options Consultation Document

- 8.20 Some of these sites (or parts of sites) were subsequently allocated in the submitted local plan. The sites are discussed below to establish the ‘residual capacity’ that could be used to meet higher housing numbers.

Key Service Villages

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

- 8.21 The 2016 options consultation document identified capacity for 90 dwellings on the preferred option sites at Blaney's Corner and East of Flower's Drove on the north eastern edge of Lytchett Matravers. The submitted plan only envisages 45 units² on these sites, although a small additional site, with capacity for about 10 dwellings, is identified in an alternative option. On the sites previously considered at north east Lytchett Matravers, there is only additional capacity for about 10 dwellings.
- 8.22 The 2016 options consultation document identified capacity for about 500 dwellings on other sites around Lytchett Matravers, including sites at the southern end of the village on Wareham Road. A site to the east of Wareham Road has been allocated in the submitted local plan for up to 95 homes, leaving the potential for about 400 homes on the other sites that have been previously considered. The proposed SANG to the north of the village has some excess capacity to partially mitigate the effects from some but not all of these further homes. The size of many of the sites, their irregular shapes and multiple ownerships are also likely to create practical difficulties in achieving the total theoretical capacity of all available land.
- 8.23 The 2016 options consultation document identified capacity for about 1,000 dwellings on sites around Wool. However, the submitted local plan only allocates land for 470 homes, leaving the potential for about 530 homes on sites that have been previously considered.

Local Service Villages

- 8.24 The only site identified at the 'local service villages' is a site for 40 homes south of Langton Matravers, part of which already has planning permission. Land at Spyway Orchard has outline planning permission for 28 dwellings and is now included in the housing supply. The capacity of the remaining part of the site (south of the Hyde) remains unchanged at about 12 dwellings. This remaining part of the site occupies a more prominent and sensitive position in the AONB.

Other Villages with a Settlement Boundary

- 8.25 The capacity of the preferred option site to the rear of Eventide, Valley Road at the western end of Harman's Cross remains unchanged at about 20 homes.
- 8.26 The capacity of the sites to the west and south east of Lytchett Minster also remains unchanged at about 650 homes in total. Further information around the effects of development on flood risk in the surrounding area are required.
- 8.27 The preferred option at Moreton Station in the 2016 options consultation document proposed 350 dwellings at Redbridge Pit, although the document also recognised that the site had the capacity for about 500 homes. The submitted local plan indicates that 490 units could be accommodated on the site, leaving no additional capacity to meet higher housing numbers.
- 8.28 One of the alternative options in the 2016 options consultation document envisaged around 100 homes on land north of Moreton Station, which remains unchanged.

² The estimates on capacity in the Purbeck Local Plan are guided by preliminary studies (including for surface water drainage schemes and landscape assessments) and indicative layouts prepared by the site promoters.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

8.29 Table 8 below sets out the residual capacity of the options sites considered in the 2016 options consultation document, having regard to the allocations in the submitted local plan and any other changes in circumstances.

Settlement	Capacity for Homes
Key Service Village	
Lytchett Matravers: North East	10
Lytchett Matravers: sites elsewhere	400
Wool	530
Local Service Village	
Langton Matravers	12
Other Village with a Settlement Boundary	
Harman's Cross	20
Lytchett Minster	650
Moreton Station: Redbridge Pit	0
Moreton Station: North of Moreton Station	100

Table 8: Residual Capacity of Option Sites Identified in the 2016 Options Consultation Document

8.30 The analysis above indicates that the residual capacity of sites previously considered in the 2016 options consultation document at the 'lower order settlements' is just over 1,700 homes. Dorset Council's view is that it would not be appropriate to allocate any of these sites to meet levels of housing provision that exceed the figure for local housing need derived from the standard method. The preparation of the Dorset Local Plan has already started and this will allow a wider range of potential options to be considered to accommodate housing growth, including locations at towns and other 'higher order' settlements across Dorset. Other options, particularly at 'higher order' settlements may provide a more sustainable means of meeting housing need, including any unmet need from neighbouring areas.

8.31 Many of the sites considered are also subject to important constraints. The sites at Harman's Cross and Langton Matravers are located within the Dorset AONB where paragraph 172 of the NPPF says that the scale and extent of development 'should be limited'. If consideration is to be given to bringing these sites forward, a judgement would have to be made to determine whether housing on them would constitute 'major development' in terms of footnote 55 of the NPPF. Whether or not the sites should be considered to be major development, the council's view is that it would be difficult to justify their allocation to provide an uplift in housing numbers above the figure for local housing need.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

- 8.32 The sites at Lytchett Matravers and Lytchett Minster are all located in the green belt, where boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Given: that the sites concerned are located at 'lower order' settlements; housing on them would provide an uplift above the figure for local housing need calculated using the standard method (part of which would be to meet unmet need from neighbouring areas); and that a wider range of options for meeting housing need will be considered through the preparation of the Dorset Local Plan, it is not considered there are exceptional circumstances to justify the allocation of these sites.
- 8.33 The remaining options are located at Wool and Moreton Station, which are located in the west of Purbeck well away from the more highly populated eastern part of the former District and the neighbouring areas where there is some evidence of unmet housing need (i.e. Christchurch and the New Forest).
- 8.34 In total the submitted Purbeck Local Plan and the preferred options for the West Dorset, Weymouth & Portland Local Plan Review propose 1,604 homes in the Moreton Station / Crossways area. Delivery would have to average more than 100 dpa over the remaining 15 years of the plan period in order for all 1,604 homes to be built by 2034. The allocation of a further 100 homes at Moreton Station may not actually deliver any more homes in the area by 2034, especially when lead-in times for development are taken into account.

9. Increasing Housing Numbers to 200 dpa: Implications for the Spatial Strategy

- 9.1 In the event that housing numbers were to be increased to 200 dpa, sites would need to be identified to accommodate about 138 additional homes.
- 9.2 Seeking to accommodate this uplift at the three towns, which form the top level of the settlement hierarchy, would be problematic. As previously discussed the council does not consider that there are exceptional circumstances to justify the allocation of the site west of Wareham, which lies within the Dorset AONB. There are also issues with the site to the east of Bere Road at North Wareham, which lies within the green belt. Developers have indicated that the site could accommodate about 95 homes, so further sites would be required in order to meet the 138 home uplift in full. Development of this site would require the relocation of the allotments. Issues about the potential impacts on heathlands and safety issues due to the proximity of the adjacent golf course would also need to be satisfactorily addressed. The site to the west of Bere Road would require the exclusion of the site from the green belt. A suitable SANG to mitigate for the impacts of this development and the development proposed by the Neighbourhood Plan at Westminster Road and Johns Road to the north of the railway line at North Wareham, would also be required.
- 9.3 If the sites at Wareham are not considered appropriate, then the options at the lower order settlements would need to be considered to meet the uplift of about 138 homes. Given the amount of housing already proposed at these settlements, it is not considered appropriate to allocate more land at the lower levels of the settlement hierarchy.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

- 9.4 Any combination of smaller sites to meet the uplift may require the allocation of additional land within the AONB (at Langton Matravers and / or Harman's Cross) or the green belt (at Lytchett Matravers). As previously stated it is questionable whether a further 100 homes at Moreton Station would actually deliver any more homes in the area by 2034.

10. Increasing Housing Numbers to 228 dpa: Implications for the Spatial Strategy

- 10.1 In the event that housing numbers were to be increased to 228 dpa, sites would need to be identified to accommodate about 586 additional homes. It would be difficult to meet this uplift without the allocation of one of the larger sites, which have been previously considered (either at Wareham or at one of the 'lower order settlements', or through the allocation of several small sites at Lytchett Matravers. Given the strategic nature of such a large allocation, and other possible options that may exist in Dorset, the council's view is that this level of additional provision (if required) should be addressed through the forthcoming Dorset Local Plan, rather than through the Purbeck Local Plan.

11. Conclusions

- 11.1 Dorset Council has undertaken a review of sources of housing land supply and this shows that the updated figure for local housing need derived from the standard method (180 dpa) can be met from sources of supply already identified in the submitted local plan. Even if the cap is removed, the updated uncapped figure (185 dpa) still can be met from sources of supply already identified in the submitted local plan. An increase in the housing provision figure to 180 or 185 dpa would not, therefore, have any implications for the spatial strategy in the local plan.
- 11.2 Dorset Council does not consider that an uplift in housing provision above the figure of local housing need is justified: to address high levels of need for affordable housing; to meet local economic aspirations; or to meet a proportion of unmet need from neighbouring authorities. It is considered that that the proposed level of growth at 180 dpa already represents a substantial uplift for the area that has required release of land from the green belt and a distribution of development that seeks to strike a careful balance between avoiding harm to the area's environmental designations and maintaining a sustainable strategy for growth. Further uplifts in supply within Purbeck could not be met without further increasing development at locations already identified for substantial growth or within the green belt or AONB. Meanwhile, the presently unknown volume of unmet need from neighbouring authorities is in the process of being addressed through the preparation of the Dorset Local Plan, which is already underway.
- 11.3 As a result of the highly constrained nature of the land around the three main towns in Purbeck (Upton, Swanage and Wareham) only about 20.2% of housing growth (excluding completions in 2018/19 and windfall) is proposed at them. A much higher proportion is proposed at 'lower order settlements', which are less constrained.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

- 11.4 Although a range of options to provide a higher level of housing growth have been considered at earlier stages of the Purbeck Local Plan, only two are located at the three towns; both at Wareham. The council does not consider that there are exceptional circumstances to justify the allocation of the site west of Wareham (which lies within the Dorset AONB) and there are also issues with the site to the east of Bere Road at North Wareham (which lies within the green belt).
- 11.5 Given the amount of housing already proposed at the 'lower order settlements' in Purbeck, it is not considered appropriate to allocate more land at these settlements, either to provide an uplift to 220 or 228 dpa.
- 11.6 The options for meeting higher levels of housing provision across Dorset as a whole (including unmet need from neighbouring areas) will be considered through the preparation of the Dorset Local Plan, which is already underway. This process will enable a more strategic approach to be taken to considering options to accommodate the growth that is needed both to meet the needs of Dorset and, if required, any unmet needs from neighbouring authorities.