

# Purbeck District Council Core Strategy Examination in Public

Hearing Statement  
on behalf of Ashvilla Estates (Wareham) Ltd  
(Respondent Reference 2799)

Matter 4: Housing and Housing Supply (Policy HS)

April 2012



**Purbeck District Council Core Strategy**

**Examination in Public**

**Hearing Statement**

**on behalf of Ashvilla Estates (Wareham) Ltd  
(Respondent Reference: 2799)**

**Matter 4: Housing and Housing Supply (Policy HS)**

Beansheaf Farmhouse  
Bourne Close,  
Calcot,  
Reading,  
Berkshire. RG31 7BW

Tel: 0118 943 0000  
Fax: 0118 943 0001  
Email: [planningreading@bartonwillmore.co.uk](mailto:planningreading@bartonwillmore.co.uk)

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## **1.0 INTRODUCTION**

- 1.1 This Statement is submitted on behalf of Ashvilla Estates (Wareham) Ltd to Matter 4: Housing and Housing Supply (Policy HS) of the Examination in Public into the Purbeck District Core Strategy Examination in Public. Ashvilla Estates (Wareham) Ltd are the promoters of strategic residential led development of land to the West of Wareham.
- 1.2 This Statement is specifically intended to respond to the Inspector's questions and set out Ashvilla Estates (Wareham) Ltd case on matters of soundness.

## 2.0 RESPONSE TO INSPECTOR'S QUESTIONS

### Issue 4.1: Are the housing policies consistent with national guidance and supported by clear and robust evidence?

4.1.1 No, the Core Strategy fails to deliver a sufficient level of housing to provide for need and to reflect the evidence base. NPPF Paragraph 156 requires LPAs to set out their strategic priorities to deliver the homes and jobs needed in the area and Paragraph 158 confirms that:

**“Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”**

LPAs should produce SHMAs<sup>1</sup> which should identify the scale and mix of housing, which meets household and population projections taking account of migration and demographic change, and addresses the need for all types of housing, including affordable housing, and:

**“...caters for housing demand and the scale of housing supply necessary to meet this demand.”**

4.1.2 The SHMA 2011 update report for Purbeck confirms that in the period 2007-11 there were only 650 new homes provided in the District (163pa) and only 21% of these as affordable homes (136 or 34pa)<sup>2</sup>. Taking account of income and estimates of household savings and equity it is estimated that 25.3% (1 in 4) of all households in Purbeck cannot afford housing at current market prices/rents without reliance on subsidy<sup>3</sup>. In terms of affordable housing need, there is an annual need to provide 520 additional affordable homes per annum. Household growth is predicted to rise by 3,396 households in the period 2011-31 – a 17% increase with an annual average increase of 170 households: some 50 more than total new homes provided for by the Core Strategy: alternatively put, the Draft Core Strategy will only deliver 70% of the housing just to satisfy projected household growth. CD120b provides a helpful comparison between the 2008 and 2011 SHMA reports and concludes that:

**“...the message is clear that housing is highly unaffordable to a large number of local people, despite the downturn in property values. The 2011 update shows the problem is getting worse, as demand for affordable housing is far outstripping supply.”**

<sup>1</sup> Strategic Housing Market Assessments: NPPF Paragraph 159

<sup>2</sup> CD120a Figure 2.2

<sup>3</sup> CD120a Paragraph 4.6

4.1.3 The Core Strategy is unsound as it fails at the first hurdle to consider additional growth options at the most sustainable locations for development including Wareham. The NPPF requires LPAs to “boost significantly the supply of housing,” and to:

**“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”**

The Core Strategy fails to have due regard to the overwhelming evidence base and the ability to accommodate a sustainable urban extension of at least 700 homes at West Wareham (which would include the 200 homes at Worgret Road already envisaged by the Submission Core Strategy) which will comply with the Habitats Regulations and more effectively address need. The NPPF confirms that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns<sup>4</sup>.

4.1.4 There are currently 2,029 households on the Council's waiting list<sup>5</sup>. The Council accepts that few landowners are willing to gift land for affordable housing (so called rural exception sites) and that the Council is powerless to influence or restrict second homes<sup>6</sup>. The house price to income ratio is now 5.50<sup>7</sup>, higher than both the national average and South West average and the 15<sup>th</sup> highest out of 350 Local Authorities in the country<sup>8</sup>.

4.1.5 The Core Strategy must also address the jobs and homes imbalance. The consequence of jobs/homes mismatch is that local people are unable to buy into the local housing market and look for housing elsewhere, leading to migration out of the region or more long distance commuting. The high cost of house and the consequent ability to live and work in the District can impact on the local economy<sup>9</sup>. The Employment Land Review notes that housing affordability is a major factor in ensuring retention and recruitment of a skilled workforce: a lack of affordable housing is already causing acute problems of service delivery<sup>10</sup>.

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<sup>4</sup> NPPF Paragraph 52

<sup>5</sup> CD31 Paragraph 1.1.1

<sup>6</sup> CD31 Paragraph's 1.1.7 & 1.1.8

<sup>7</sup> CD131 Annual Monitoring Report Page 20

<sup>8</sup> CD94 Paragraph 3.18

<sup>9</sup> CD95 Paragraph 6.1

<sup>10</sup> CD95 Paragraph 10.6

- 4.1.6 With substantial additional employment opportunities at Holton heath and Admiralty Park there will be a need to ensure balance in the provision of homes to meet predicted employment growth. Indeed, the Bournemouth, Dorset and Poole Economic Partnership for Dorset (BDPEP) in its 'Raising the Game' sub-regional economic strategy highlights that housing scarcity and lack of affordability will promote the growth of communities as second home and retirement locations. Housing affordability will not be addressed and the sub-region could become less competitive as a business location<sup>11</sup>: the provision of affordable housing is seen as a key issue to developing a more competitive economy<sup>12</sup>.
- 4.1.7 Rural areas suffer from acute affordability problems, exacerbated by limited housing supply, leading to increasing unsustainable development patterns and constraint to rural and urban economic growth. For example, Purbeck delivered only 67% of its Structure Plan required housing between 1996 and 2005.
- 4.1.8 It is therefore vital for firms to be able to recruit skilled replacement labour or their production, innovation and overall competitiveness will be affected, and inward investment may be jeopardised.
- 4.1.9 All LPAs must establish through evidence a sound housing requirement, which must take into account housing need and demographic growth. The fact that the Council are only proposing to make provision for 2,520 dwellings over the plan period when provision should clearly be made for at least 5,150 in total in line with the evidence based approach of the Regional Strategy, has a detrimental, knock-on effect on the establishment of an appropriate strategy. Therefore it is considered that the housing requirement for Purbeck must now be reconsidered as part of the Core Strategy process against the background of local need to ensure that the housing requirements of the District are met.

**Issue 4.2: Is the information in the Strategic Housing Land Availability Assessment (2011) soundly based? Have current economic conditions been taken into account?**

- 4.2.1 The SHLAA (CD117 & CD118) highlights approximately 7,000 homes which have been identified on sites promoted: more than sufficient to meet the proposed housing delivery. This question is for the Council to provide their response to the Inspector. Purbeck has provided an average of 145 dwellings per annum in the period 1998-2010, in excess of the Submission Core Strategy proposed.

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<sup>11</sup> CD95 Paragraph 10.13



**Issue 4.3: Is the overall housing provision based on a sound assessment of supply and demand?**

4.3.1 See response above to Issue 4.2.

**In particular:**

**(a) are the expectations for delivery of existing commitments reasonable? Significant reliance is placed on commitments/character area potential (in policy HS) particularly for the years 2022-2026. What is the justification for this?**

4.3.2 There does not appear to be any firm justification for the reliance placed on character area potential, which is a form of windfall estimation using character area appraisals and trends relating to recent planning permissions to provide a proxy for the anticipated contribution this development potential may add to the housing supply. NPPF Paragraph 47 confirms that LPAs should identify a supply of specific deliverable sites to provide 5 years supply, and a supply of specific, deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. An allowance can be made for windfalls, where there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply, taking into account the SHLAA, historic rates and expected trends: and should not include residential gardens. In light of the publication of the NPPF, the Council must identify what reliance was placed on residential gardens in the character area potential study (CD108).

**(b) is the proposed trajectory realistic and can it be delivered?**

4.3.3 Whilst the low level of growth in the draft Core Strategy may be capable of delivery, uncertainties remain regarding the high reliance on windfalls and that the Swanage allocations are to be made under a future DPD.

**(c) what assessment of previously developed land has been undertaken?**

4.3.4 This is a question for the Council to respond to, though it is noted that an Urban Potential Study was undertaken in 2006. This indicated a constrained yield average of 69 dwellings per annum. However, this included outstanding allocations at Wool and Bovingdon of 194 dwellings. Discounting these units would leave an average of 60dpa. If intensification sites are then discounted in light of NPPF Paragraph 48 (gardens, residential garages, garage courts and communal parking areas, backland sites – not least because gardens are not classed as previously developed land) the yield is reduced from 1196 to 763 over a 20 year period, equating to 38 dwellings per annum. The yield from previously developed sites is therefore limited.

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<sup>12</sup> CD95 Paragraph 10.14

**(d) is the contribution that windfall sites could make to housing provision appropriate and robust? And**

4.3.5 The Council has failed to demonstrate why it cannot demonstrate specific developable and deliverable sites for the first 15 years of the plan and accordingly the Core Strategy in planning for 57% of the remaining residual housing requirement to 2026 as windfall sites (710 character potential windfall plus 100 other windfall) is not justified and is not consistent with national policy. The Council should set out details of each windfall site to which reliance is placed, with confirmation of the assumed density/yield in order to ensure a robust view can be taken at the examination of the reliability of the assumptions made in accordance with the tests in NPPF Paragraph 48.

**(e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economy and financial constraints, land ownership and issues of ecological importance?**

4.3.6 There is little flexibility for the Council. The Housing trajectory in Policy HS indicates a reliance on settlement extensions to be completed at Wareham, Bere Regis (part), Lytchett Matravers, Upton and Swanage (part) in the period 2013-17, 59% of the supply during the first five years of the plan. Swanage is subject to a subsequent DPD and there is currently no defined SANG strategy. Concern has been expressed in our submissions with regard to the efficacy of the SANGs at Stoborough to serve the Worgret Road proposed allocation. This all places a significant reliance on securing both allocations, post adoption of the Core Strategy, ensuring adequate SANG avoidance measures are provided, and then ensuring that the high proportion of windfalls are delivered in the latter part of the plan period. This all reinforces the conclusion that the Core Strategy does not provide for sufficient growth and that there is a strong reliance on a small number of allocations early in the plan period and then a significant proportion of windfall development to achieve the growth 2,520 dwellings in the period to 2027.

**Issue: 4.4 Should the Core Strategy establish the Council's overall approach to housing densities, as suggested in paragraph 47 of the NPPF?**

4.4.1 Yes, the NPPF now sets out that LPAs should set their own approach to housing density to reflect local circumstances<sup>13</sup>. The Core Strategy should provide policy guidance on the density range expected for each strategic allocation (allowing for different dwelling types and the creation of mixed communities), and to provide guidance for non-allocated sites. However, where the Core Strategy does not allocate a specific strategic

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<sup>13</sup> NPPF Paragraph 47

site, such as at Swanage, it would be appropriate for a subsequent AAP or DPD to define the density for that allocation in accordance with the site specific circumstances.