



**Purbeck Core Strategy
Examination in Public**

Issues for Discussion

Housing & Housing Supply

**Written Representations on behalf of
Imerys Minerals Ltd.**

April 2012

1.0 INTRODUCTION

1.1 This statement comprises a written representation response to the issues identified by the Inspector in the Examination in Public (EIP) of the Purbeck Core Strategy (CS). It is prepared by Peter Atfield B.Tp MRTPI on behalf of Imerys Minerals Ltd. (Imerys). Mr. Atfield's qualifications and experience is set out in **Appendix 1** to this statement.

1.2 Specifically, this submission deals with Matters 1, 2, 4, 5, 11 & 14 in so far as they are relevant to the consideration the potential residential development (as sought in previous representations) of land owned by Imerys at Steppingstone Fields, West Lane, Stoborough. The land currently comprises grassed fields with hedgerows to the boundaries. The site is identified on the plan at **Appendix 2**. This plan also shows a suggested revised settlement boundary allowing for the allocation of the land as an urban extension.

2.0 MATTER 4: HOUSING AND HOUSING SUPPLY (POLICY HS)

2.1 *Issue 4.1* questions whether Policy HS is consistent with national guidance and based on robust evidence. We have already commented that the NPPF now requires the housing requirements to be increased by 5% in the first five years. This needs to be reflected in the schedule contained within Policy HS.

2.2 The schedule contained in Policy HS includes potential housing supply from sites identified in a character area appraisal. This source needs to be re-appraised against the advice set out in Paragraph 53 of the NPPF, which urges local planning authorities to resist the inappropriate development of residential gardens.

2.3 *Issue 4.2* refers to the SHLAA; and whether current economic conditions have been taken into account. We believe that the economic issues are not only relevant to both the state of the economy and its impact on the housing market, but also need to reflect restrictions imposed through

planning policy constraints. We will make more detailed comment on this later in these representations. However, we use as an example here the Purbeck District Council Viability Report Update of August 2011. This seeks to support the council's approach to the provision of affordable housing. It concludes, in Section 4, that residual land values remain high, and that; *"The net effect is, in the round, to make schemes more, rather than less viable as assessed in the previous two reports."*

- 2.4 We believe that the council has been entirely misled on this point. Figure 1 of the report suggests that the residual value of land in coastal areas is just below £3.5M per hectare (£1.4M per acre). This is based on a typical, but hypothetical, 45 dwelling per hectare scheme. We regard this value as being double the true value of land, if indeed sites of this nature exist in coastal areas.
- 2.5 As a consequence, planning policy expectations have been raised. Planning obligations are now at an unsustainably high level. When combined with general market conditions, deliverability is stifled. This needs to be reflected in the SHLAA so as to make it a more meaningful 'tool' in the planning policy process.
- 2.6 *Issue 4.3* raises a series of detailed questions relating to housing supply and demand, including the housing trajectory. This is illustrated on Page 13 of CS Background Paper 5. It indicates the following:
- That dwelling completions have substantially reduced over the last four year period; from a high of 208 in 2007/2008 to a low of 77 in 2010/2011. The current completion rate is about one third of what it was four years earlier.
 - All commitments are expected to be built out in the period to 2015. This appears to be an over optimistic prediction. Construction rates remain low - for the reasons set out in the SHLAA - restrictions on finance, bank lending etc. It appears more prudent to estimate a lower contribution from commitments in the next four years.

- Settlement extensions are shown to commence in 2013 / 2014. This is considered optimistic, taking into account the need for the CS to move to adoption stage. Each urban extension will need to be subjected to appropriate Environmental Impact Assessment; and subsequent planning applications.
- It does not appear realistic for the Character Area Potential sites to contribute such large numbers over a continuous nine year period.

2.7 We therefore consider that Policy HS would be more robust if additional urban extension sites were included within it. They will provide more certainty in achieving the housing trajectory, particularly in the middle years of the plan period. Currently, the many of the components of the trajectory contain uncertainties over deliverability.

2.8 We have no particular comment to make in respect of *Issue 4.4*; the density of development.

APPENDIX 1

Qualifications & Experience

This EIP statement is submitted by Peter Atfield, B.Tp MRTPI. I hold a degree in town planning from what is now known as the University of the South Bank, London. I am a member of the Royal Town Planning Institute, having been elected in November 1984. Prior to that date I spent 10 years training and practicing in public service, holding positions as a Planning Technician, Planning Assistant (Design & Conservation) and Planning Assistant (Countryside Policy and Projects).

I am now an Executive Employee and hold the position of Director of Planning, Goadsby Survey and Valuation Ltd. (a trading subsidiary of the Goadsby Group of Companies), having been employed by them for 28 years. I advise the firm and its' clients on a range of planning policy, development control and enforcement matters across Central Southern and South West England; but principally in Dorset, South Wiltshire and South Hampshire. In addition to my employment, I contribute voluntarily to some background work to assist in the formulation of local planning policy and practice. This includes my role as an external advisor to the South East Dorset Strategic Housing Land Availability Assessment Panel. I have also provided input to emerging Community Infrastructure Levy policies and charging schedules in Dorset.

My planning caseload comprises residential, commercial and leisure development. My principal clients include Barratt David Wilson, Christchurch Borough Council, Forrelle Estates, Hall & Woodhouse Ltd., Imerys Minerals Ltd., Libra Homes, Licet Holdings / NCP, London & Henley Group, Network Rail (Infrastructure) Ltd., Newsquest Southern, Persimmon Homes (South Coast) Ltd., The Royal Bournemouth & Christchurch Hospitals NHS Foundation Trust, Seaward Properties, Sembcorp Bournemouth Water and Shorefield Holidays.

APPENDIX 2

Site and Suggested Settlement Boundary

