

Examination of the Purbeck Core Strategy Development Plan Document

Statement of JS Bloor (Newbury) Ltd

Matter 4: Housing and Housing Supply (Policy HS)

Foreword by JS Bloor (Newbury) Ltd

JS Bloor (Newbury) Ltd considers that a deliverable, strategic, housing-led development proposal exists at Lytchett Minster.

Land at and around this village offers the potential to address the District housing allocation shortfall, and to deliver in tandem a high quality strategic SANG that has the potential to avoid and mitigate recreational impacts on the Dorset Heathlands as part of a wider package of mitigation measures.

The local planning authority has not taken a positive approach to exploring the delivery potential and scenarios for this area. It has looked for difficulties and problems, rather than working collaboratively to provide solutions for delivery that work within the framework of the Habitats Regulations. In failing to take a positive approach it has overlooked the obvious strategic location in the District for increasing the supply of homes that Purbeck District – and the wider South East Dorset conurbation – requires now and in the longer term.

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

Purbeck District Council has not determined the objective reference point it is using to determine the market and affordable housing needs for the area.

However the Core Strategy figure of 120 units per annum is significantly less than 170 dwellings per annum identified in the 2011 Strategic Housing Market Assessment (SHMA), ie 2,400 dwellings in the twenty year period 2006-2026 is proposed by Purbeck District Council rather than 3,400 dwellings identified by the latest housing requirements evidence.

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

JS Bloor (Newbury) Ltd would simply comment that the SHMA is the only up to date evidence available on the housing needs for the area informed by national housing projections, which do themselves take into account economic changes. The current provision within Purbeck Core Strategy falls significantly short of meeting the growth need identified by the SHMA.

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

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

No.

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

No up to date, robust assessment appears to be available.

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

No, there is over reliance on windfalls.

The heavy reliance on windfall is a high-risk strategy, particularly given the national policy resistance to garden infill, which means that the supply of homes from this source

will dwindle. Local evidence related to these matters is now dated, and is not considered to be reliable. Work on windfall sites requires updating, in the line with the advice of paragraphs 48 and 53 of the NPPF.

(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?

For the reasons set out in our statements to the Examination, an immediate partial review of the Core Strategy is required to provide for further growth and add flexibility to address point (e) and related issues.

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

No comment.