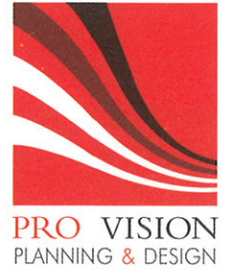


Position Statement



Matter 4
Representor 2574
The Charborough Estate

PURBECK LDF
CORE STRATEGY DPD
EiP

MATTER 4 : HOUSING AND HOUSING SUPPLY
(POLICY HS)

Position Statement
On behalf of:
The Charborough Estate

Pro Vision Planning and Design
AJP/CHA/1233

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CONTENTS

- 1 Overview
- 2 Issue 4.1 Clear and Robust Evidence
- 3 Issue 4.2 The SHLAA
- 4 Issue 4.3 Overall Housing Position
- 5 Issue 4.4 Density
- 6 Changes required to the Core Strategy

ATTACHED

Front Covers:

Representation 2574 / HLS

Representation 2574 / AH

Representation 2574 / CEN

OS Extracts

Sandford White Land

Tantinoby, North Wareham

Ferncroft, North Wareham

1 Overview

1.1

The Charborough Estate (2574) submitted a Representation in response to Housing Land Supply. For the purposes of this Position Statement this is referred to as **Representation 2574/HLS**. A copy of its front cover is attached to help the Inspector identify the document.

1.2

The Estate also submitted a Representation in response to Policy AH (Affordable Housing) and this is also relevant to the matter of overall housing supply. This is referred to here as **Representation 3574/AH** and again a copy of the front cover is attached.

1.3

Also relevant (to Issue 4.2) is the plan attached as Appendix B to **Representation 2574/CEN**.

1.4

Cross reference is also made to The Charborough Estate **Position Statement on Matter 14 CEN** in relation to Issue 14.2 Green Belt.

1.5

In essence, we summarise the Estate's concerns with regard to Matter 4 as follows:

- 1) The Council is proposing a high risk strategy which will significantly reduce the housing annual housing completions from 164 dph in 2009 to may be as little as half of that;
- 2) This is unlikely to meet local housing need (particularly in an area of high demand from outside the District);
- 3) The proposed 2400 dwellings has been miscalculated, because it does not take account of local need arising from Upton, so the figure needs to be higher, and flexibility needs to be built into the Core Strategy.
- 4) The expected contribution from Windfalls is over optimistic if the proposed Policy AH is adopted, since this is likely to eliminate the viability of infill / redevelopment sites for 2 – 5 dwellings; therefore the green field element needs to be higher (or flexibility needs to be built into the Core Strategy);
- 5) In any case the green field element needs to be higher because this is the main way in which affordable housing is going to be delivered. The Core Strategy as set out therefore fails to deliver enough affordable housing to meet local needs and an increase in green field provision is thus essential;

- 6) The Core Strategy as set out does not build in any flexibility to address the foregoing (and this lack of flexibility is also now contrary to the NPPF requirement to identify “white land” on the edges of the Green Belt to allow for possible future need).

1.6

In respect of housing land supply and policy the Core Strategy as now set out is unsound in respect to NPPF 182 in that it is not:

- 1) Positively prepared - the strategy will not in fact meet the requirements of the Community;
- 2) Justified – as it stands it is not the most appropriate strategy in the light of reasonable alternatives (the “moderate change” approach);
- 3) Effective – it will not deliver the housing needed by the Community, especially the vital range of affordable housing.
- 4) For all these reasons it is not consistent with National Policy.

1.7

In order to make the Core Strategy sound in these respect to housing land supply and policy the following moderate changes are required:

- 1) At the very least, white land must be:
 - a. Retained at Sandford (Wareham St Martin); and
 - b. Created at Tantinoby and Ferncroft, North Wareham.
- 2) Consideration must be given to allocating these sites for about 350 houses (up to 50% affordable to suit the social housing, small private rented and small privately owned sectors).

2 Issue 4.1 Are the Housing Policies Consistent with National Guidelines and Supported by Clear and Robust Evidence?

2.1

We refer to the NPPF where relevant throughout this Position Statement, so there is no need for a separate reply to this part of the question.

2.2

However, the answer to the question about “clear and robust evidence” is “No”.

2.3

As explained in Representation 2574 / HLS paras 3.5 – 3.6, the figure of 2400 dwellings was proposed by the RSS to meet the local housing needs of Purbeck District **excluding** Upton. It is therefore necessary to add an allowance for **local** needs at Upton to that figure of 2400.

2.4

We have calculated this as follows:

a)	Purbeck District total population (from CS 2.2)	45,158
b)	Upton (and Lytchett Matravers) population from “Dorset for You” website	8,160
c)	“Rest of District” Population thus	37,000
d)	The figure of 2400 was thus based on the local needs of a population of 37,000 and needs to be factored to meet the needs of a population of 45,000	
e)	The Purbeck District Council 5 year HLS Agreement (April 2011) identified a total outstanding requirement (to achieve 2400) of	1,614
f)	1614 factored by the difference between 37,000 and 45,000 is	1,963
g)	The additional housing provision which the CS needs to make is thus about (1963 – 1614 = 349)	350

2.5

The Sandford “white land” could provide about 130 units (see below). However, there may be short term issues with regard to traffic generation (see Position Statement on Policy LD and Policy CEN).

2.6

Potential sites at North Wareham (Tantinoby and Ferncroft) could provide about 215 units (see below). These could be allocated now (with adjacent and deliverable SANGS).

2.7

A logical and deliverable approach could therefore be to:

- a) Allocate Tantinoby and Ferncroft now, for 215 units (plus employment between Ferncroft and Westminster Road); and
- b) Retain the Sandford white land for the probable future need for a further 130 units.

SANGS for North Wareham and Sandford

2.8

Another very important aspect of the lack of robust evidence base is addressed by Representation 2574/HLS at Paras 3.23 – 3.32 inclusive. We cast considerable doubt on the soundness of the Report “Purbeck Core Strategy, Implications of Additional Grown Scenarios for European Protected Sites.”

2.9

The fact is that extensive SANGS are readily available for housing development at North Wareham (Tantinoby and Ferncroft) and the “white land” at Sandford. The report fails to recognise this fact. It is therefore fundamentally incorrect in that respect and thus cannot be regarded as a robust or sound basis for identifying the strategic location of housing.

2.10

Representation 2574/CEN Appendix B comprises a hand drawn sketch map showing potential SANGS in relation to development at North Wareham (Tantinoby and Ferncroft). The land shown green (potential SANGS and other POS) is in the same ownership as the land hatched red (potential development land). For the most part the “green” areas are not currently available for public access and would form a buffer between new (and existing) development and SPA heathland.

2.11

At Sandford the Charborough Estate owns most of the land between the existing / proposed development and the railway. Extensive SANGS can again therefore be provided which again will form a buffer between existing / proposed housing and heathland SPA, making the housing provision deliverable in that respect.

3 Issue 4.2: Is the SHLAA Soundly Based?

3.1

We can only answer this question in respect to North Wareham (Ferncroft, Tantinoby) and Sandford. The landowner is willing to make these sites available for development during the plan period. Approaches from developers indicate that they could be readily taken up by housebuilders.

3.2

Pro Vision has extensive experience of promoting and delivering land for housing development in Gloucestershire, Somerset, Wiltshire, Dorset, Hampshire, Berkshire, Sussex and Kent. We are confident that each of these sites is in essence, viable and can be expected to be delivered during the Core Strategy period if allocated.

3.3

Each of these sites can provide extensive SANGS. None has significant vehicular access issues as such. We see no reason why practical and viable approaches to foul drainage, land drainage cannot be achieved for each site. We would expect each site to be able to provide any appropriate strategic landscaping or on-site POS or other facilities on site, and make any reasonable off site contributions as appropriate.

Sandford White Land

3.4

We attach an OS extract based on the SHLAA. The area measures at a fraction over 7ha. However, Natural England have indicated informally that if this area were to be developed they would want to see a green corridor between the development and the railway. If we assume that might reduce the site to 4.7 ha, and that half is developed at 30 dph for affordable housing, and half at 25 dph for market housing, it can deliver 130 units. If the whole 7 ha were developed on the same basis the site could deliver up to 200 units. The SHLAA therefore seriously under-estimates its capacity. The "green corridor" plus an area immediately to the east at least as large as the development area is available for extensive SANGS, which may also help to reduce pressure on heathland from the existing population of Sandford.

Tantinoby, North Wareham

3.5

Again we attach an OS Extract. The area measured assumes the allotments are relocated to the east, resulting in an area of over 5.1 ha. Assuming 50% affordable at 30 dph and 50% open market at 25 dph it will deliver 140 units. Again the SHLAA under estimates its capacity.

Ferncroft, North Wareham

3.6

The attached OS Extract relates to Representation 2574/CEN and is a smaller area than measured by the SHLAA, to avoid adverse landscape impacts. Again, on a 50/50 affordable / market basis it would delivery 75 units.

3.7

The OS extracts attached are based on Ordnance Survey scale map data with the permission of the Controller of Her Majesty's Stationery Office. OS Copyright Licence AR100018708

4 Issue 4.3 Overall Housing Provision

Character Area Potential

4.1

Our concerns relating to the non-viability of Windfall sites apply equally to “Character Area Potential”. These concerns are set out in Representation 2574/AH Section 3, in which we explain that Policy AH is liable to render small infill sites unviable unless promoted for one house only. Thus the expected delivery from such sites is liable to be less than forecast.

Is the Proposed Trajectory Deliverable?

4.2

For the above reasons we believe the trajectory will not be delivered and additional provision thus needs to be identified.

Previously Developed Land?

4.3

The Charborough Estate has no evidence to contribute to this issue (other than to comment in passing that in villages redundant “modern” farm buildings can have all the characteristics of PDL and should really be considered as redevelopment sites for village housing wherever appropriate).

Windfall Sites

4.4

See 4.1 above

Flexibility

4.5

For the reasons outlined in Sections 1 and 2 of this Position Statement, we believe the Core Strategy needs greater flexibility in order to achieve the aims and objectives of the community, and at 2.7 above we indicate how that flexibility can be delivered.

5 Issue 4.4 : Density

5.1

NPPF 47 (Bullet Point 5, P13) advises that the Local Planning Authority **should** set out their own approach to housing density to reflect local circumstances. A relevant reference therefore needs to be made in the adopted Core Strategy.

5.2

The local circumstances in Purbeck vary considerably, compared with (say) urban authorities such as Portsmouth or Bath where there is a relatively consistent urban character. Purbeck's settlements vary considerably. It has the very loose-knit scatter of settlements such as Morden, low density high-quality Victorian residential areas the 1930's and 1960s mid – density areas such as Northmoor Park, Wareham, and historic terraced areas such as the centres of Wareham, Corfe Castle and Swanage – which are each different from each other. We are therefore not convinced a density policy for Purbeck would be sound.

5.3

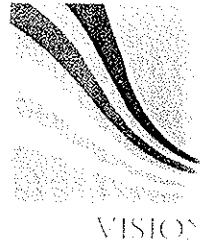
We consider that the correct approach is to identify the appropriate form of development in response to the characteristics of each site and its context. That will determine the appropriate density for each site. In our opinion this approach is addressed by NPPF Section 7. It may well be that Policy LHH needs to be revised to reflect NPPF Section 7, but not in respect to setting out minimum, average, typical, or maximum densities.

**PURBECK DISTRICT COUNCIL
CORE STRATEGY:
PRE-SUBMISSION CONSULTATION**

**REPRESENTATIONS
on behalf of
THE CHARBOROUGH ESTATE**

**IN RESPECT OF
HOUSING LAND SUPPLY**

AJP/20227/10.12.10



**PURBECK DISTRICT COUNCIL
CORE STRATEGY**

PRE-SUBMISSION CONSULTATION

REPRESENTATIONS
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**IN RESPECT OF
POLICY AH
AFFORDABLE HOUSING**

AJP/20227/10.12.10

**PURBECK DISTRICT COUNCIL
CORE STRATEGY**

PRE-SUBMISSION CONSULTATION

REPRESENTATIONS
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IN RESPECT OF

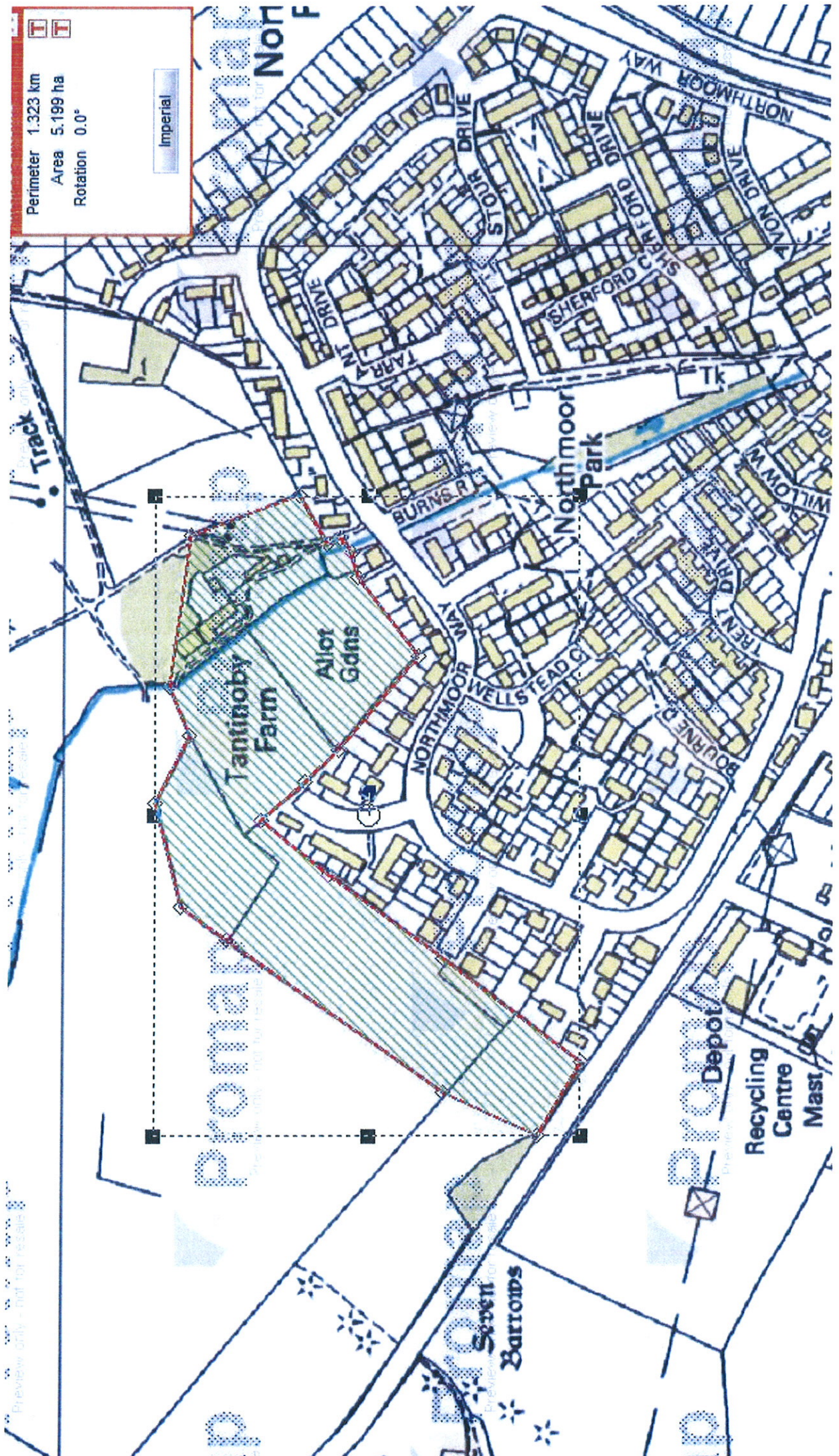
**SECTION 7.3
POLICY CEN
WAREHAM & SANDFORD**

AJP/20227/10.12.10

Preview only - not for resale

Perimeter 1.323 km
Area 5.199 ha
Rotation 0.0°

Imperial



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