

Purbeck District Council: Core Strategy Examination in Public Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

MATTER 4: HOUSING AND HOUSING SUPPLY (POLICY HS)

- 1.1 ZBV (Winfrith) limited is an existing, significant landowner and investor in Purbeck District, with an extensive history in supporting the future for Dorset Green Technology Park, Wool. ZBV (Winfrith) Ltd has made a number of representations to Purbeck District Council with regard to the objectives and policies contained in the LDF Core Strategy, Submission Draft.

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

- 1.2 The Core Strategy acknowledges in the Vision for Purbeck and Spatial Objective 2 that there is a critical need to deliver new housing within the District. The housing target established in the Core Strategy of 2,400 homes to be provided for the period 2006-2026 with a further 120 dwellings in 2026/27 (giving a total of 2,520) is equivalent to 120 dwellings per annum. This is lower than Government's own housing growth projections (2009), which identified a need for 4,000 dwellings in Purbeck over the same period (paragraph 6.1.2 in the Core Strategy), and the housing targets previously included within the proposed changes to the South West RSS (July 2008), which targeted the provision of 5,150 new homes in Purbeck.
- 1.3 In establishing the level of housing provision to make it is apparent that the Core Strategy has not sought to accommodate the 5,150 dwelling requirement set out in the extant RSS, but has instead made provision for less than half this figure. ZBV considers that the Council's view at paragraph 6.1.2 of the Core Strategy that "meeting these higher level growth needs is extremely difficult", means that the Plan's policies fail to accord with national

policy in the NPPF at paragraph 47 “to boost significantly the supply of housing” and at paragraph 156 by failing to include strategic policies to deliver “the homes and jobs needed in the area”. As ZBV note in response to Matter 5, the housing evidence base for the Core Strategy contained in the 2008 SHMA and its 2011 update are robust and up-to-date. Both clearly signal a need for significant numbers of new homes (market and affordable) throughout the plan period. The Core Strategy policies fail to meet these housing needs.

- 1.4 In ZBV's view this is because the earlier preparation stages of the Core Strategy failed to adequately identify, test and evaluate the full range of alternative housing growth options available. A point that ZBV has made through its previous representations to the Core Strategy Issues and Options, Preferred Options and at the Submission Draft stages.
- 1.5 Effectively, when the Council concluded that the strategic housing Area of Search 7B (Lytchett Minster area) identified in the RSS (to accommodate some 2,750 dwellings) could not be delivered by reason of impact on protected European habitat, the Core Strategy simply failed to adequately consider alternative options (as paragraph 152 of the NPPF requires) or plan on a flexible basis to meet changing needs (as paragraph 14 of the NPPF establishes) to identify sites capable of delivering the total dwellings the RSS established (or the figure that the Government's own housing projections also showed were necessary).
- 1.6 Even putting the South West RSS dwelling target and former Government household projection to one side, ZBV's independent analysis of demographic forecasts for the District (using SNPP data and updated migration data) in the period to 2026 show an increase in the population to some 5,065 people representing a need for 3,524 new dwellings (Appendix 4.1 to this submission).
- 1.7 The former Government Office for the South West (GOSW) identified this issue clearly to the District Council in its letter of 23rd November 2009 which

responded to the 'Preferred Options Consultation' on the Purbeck Core Strategy.

- 1.8 In their letter, GOSW make it clear that balancing homes, jobs and access to services is "not only a key spatial policy driver in the emerging RSS...but also a fundamental sustainable development principle which runs through national planning policy guidance including e.g. PPS1, PPS3, PPS7 and PPG13". The letter goes on to note that Purbeck has two existing commercially functioning 'strategic employment locations' (i.e. Winfrith Technology Centre/Dorset Green Technology Park and Holton Heath/Admiralty Park) and that these sites should be seen as 'fix points' around which housing distribution "needs to be explored" to come to a view which distribution would represent the most sustainable option.
- 1.9 Alternative development site opportunities therefore exist in the District that the Council did not comprehensively explore or consider as alternatives to meet the identified housing needs, nor indeed the demographic forecast position that exists if the RSS is set to one side.
- 1.10 The larger strategic, previously developed opportunity sites were not included in the Core Strategy (particularly Dorset Green Technology Park), which means that the Council has not responded to the acknowledged shortfall in housing supply within the plan period. This issue is particularly acute given that the housing target proposed in the Core Strategy is insufficient to meet the housing needs of the District.
- 1.11 ZBV consider this to be wholly unacceptable leaving the District with a tenuous five housing land supply of 635 dwellings (comprised of existing commitments that must be delivered in full). This represents 5.78 years supply when measured against the target in policy HS, but only 2.17 years of land supply when measured against the RSS target. If the supply is compared to the dwelling requirement from ZBV's own household forecast (using the latest ONS data adjusted for migration flows set out in Appendix 4.1) the land supply is some 3.44 years. There is therefore **only** a five year housing land supply if the deliverable supply of dwellings is measured against the Council's own

flawed housing target of 2,400 dwellings that will not meet evident housing need. This position is contrary to paragraph 47 and 159 of the NPPF and also fails to meet affordable housing needs as the 2008 and 2011 SHMA both identify.

- 1.12 At a strategic level therefore ZBV conclude that the housing policies of the Core Strategy are not consistent with the NPPF (nor indeed the former PPS1, 3 and 12 which were in force when the Core Strategy was drafted); are deficient in terms of the total quantum of housing proposed; the level of affordable housing to be delivered (see ZBV's more detailed response to Matter 5); and the lack of a more comprehensive assessment of alternative options.

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

- 1.13 ZBV have reviewed the SHLAA method, approach and detailed findings and are concerned that the process has not been soundly based. The SHLAA fails to conform with the established SHLAA Practice Guidance (July 2007) (in place at the time of the SHLAA's preparation) and is deficient in terms of the analysis it presents particularly on the deliverability and developability of sites (CLG Guidance Stage 7) and the conclusions that are subsequently drawn.

Site Availability and Suitability

- 1.14 In ZBV's view the SHLAA's analysis of each potential sites suitability, achievability and availability was undertaken at a very superficial level. The manner in which the assessment criteria were created and applied is not clear and the depth and consistency of that analysis is poor.
- 1.15 The SHLAA made a crude assessment of what constitutes insurmountable constraints to residential development stating that "sites which are:
- Within 400 metres of an internationally protected heathland;
 - Have no relationship with an existing settlement boundary; or

- Within Flood Zones 2 and 3

are to be excluded from the short and long term housing potential, unless exceptional circumstances are met”.

- 1.16 The 400-metre heathland buffer is derived, ZBV understand from Natural England guidance. However there is a concern that this broad-brush approach is too crude in examining either existing mitigation opportunities, or how mitigation could be achieved, to negate a potential residential developments' effect on internationally protected heathland. In addition, no obvious assessment is made concerning other European environmental designations such as Ramsar, SAC and SPA, etc. in the SHLAA.
- 1.17 The removal of all land in Flood Zone 2 also fails to reflect the opportunity that large areas of land within such a designation could contribute in housing terms and does not accord with either the former PPS25, or guidance in the NPPF in making an appropriate assessment of the ability of potential sites in such locations to be used for residential purposes subject to mitigation.
- 1.18 The SHLAA's accompanying document SHLAA: Maps of Submitted Sites (2011) fails to provide clear insight into the assessment of each site and provides inconsistent information in ZBV's view.
- 1.19 By way of example, the appraisal of Land adjoining Winfrith Technology Centre and Land adjoining Longmead are exactly the same yet are given different categories of deliverability.
- 1.20 Both sites are deemed as achievable and available and with regards to their suitability both are located outside of established settlement boundaries and are judged as “maybe” suitable. However in the SHLAA the latter site is part of the long-term supply whereas the former is excluded. The differentials between both sites are not described in the SHLAA in any manner that would allow the reader to understand how or why the distinction is drawn.
- 1.21 It can only be assumed that in the SHLAA process, the Winfrith Technology Centre was considered as not as ‘well-related’ to the settlement boundary as

the Longmead site. This highlights the deficiency of the SHLAA in establishing clear, objective measurement criteria that define what constitutes “well-related” in terms of a sites' location within or outside settlement boundaries.

Economic Viability – Achievability

- 1.22 ZBV has a particular concern that the achievability aspect (i.e. development viability) has not been examined or assessed in any objective detail. There is simply no substantive evidence presented within the SHLAA report on a site-by-site basis, nor at a wider District or spatial sub-area level that potential sites are achievable based on up-to-date economic viability appraisal.
- 1.23 The site-by-site commentary for achievability in the Maps of Submitted Sites SHLAA document simply notes for each site that “yes – likely to be economically viable. However the current economic situation makes such predictions difficult”. It is upon this less than rigorous analysis that the SHLAA identified deliverable and developable sites and excluded others.
- 1.24 The SHLAA process has therefore failed to examine achievability at a site level or even on an area basis within the District and this lack of deliverability evidence is carried forward into the Core Strategy through the proposed Strategic and non-strategic housing allocations. ZBV consider that this is a significant failure to demonstrate that the SHLAA and therefore the Core Strategy policy HS is justified or effective.

The Conclusions of the SHLAA

- 1.25 The Strategic Housing Land Availability Assessment draws conclusions that there is an identified potential housing land supply in the District capable of accommodating 7,973 dwellings; more than the 5,150 dwelling target established in the extant RSS and far greater than the 2,400 dwellings target planned for in the Core Strategy.
- 1.26 The SHLAA's analysis and conclusions drawn in respect of each potential sites position in the five, ten or long term housing land supply is unclear in ZBV's view. The SHLAA states that sites which comprise the longer-term supply are

all outside, but well related to settlement boundaries or have a potential to meet broad locations. However, there is no delineation between the 6-10 year and 10+ year time-periods, nor is there an indication as to which sites are more appropriate than others, which would assist in justifying any amendments to the settlement boundaries.

- 1.27 Overall ZBV consider that the SHLAA is deficient in its analysis of potential housing sites and the level of housing land supply resulting. This issue is then compounded by the manner in which the SHLAA has been used as the basis for the Core Strategy location of development and housing policies.

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?**
- c) what assessment of previously developed land has been undertaken?**
- d) is the contribution that windfall sites could make to housing provision appropriate and robust? and**
- 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?**

- 1.28 The Core Strategy sets out the basis for future housing delivery in the District through policy HS, the Housing Trajectory and Map 5. ZBV is concerned that the composition, characteristics and spatial distribution of the housing land supply is unrealistic and that the policy and housing trajectory are not based on a sound assessment.

Existing Commitments and Realism/Deliverability of the Trajectory

- 1.29 The Core Strategy sets out the proposed housing trajectory for the District. The housing delivery is comprised of completions to date, existing commitments with the benefit of planning permission, then proposed settlement extensions and finally, in the latter stage of the plan period,

housing provided on land within proposed Character Area Potential (CAP) locations. The Council also recognises the historic role of windfall dwellings in forming a substantive part of the overall housing supply.

- 1.30 The ability of policy HS to deliver, control and manage the Core Strategy's proposed housing supply trajectory is not evident. The composition of the housing trajectory is unrealistic as it sets out no anticipated blend or mix of different sites coming forward in each period. The housing supply is wholly comprised of development of existing commitments and on settlement extensions in the first five year period and beyond to 2017/18, with CAP sites coming forward only after 2017.
- 1.31 The presentation of both the Housing Trajectory and Policy HS (Housing Supply) is therefore unclear. It appears that the existing commitments make up the initial three years housing supply from 2010/11 to 2012/13 at 120 dwellings per annum. The actual figures committed cannot be disaggregated in policy HS. ZBV are concerned that the trajectory does not therefore use the actual committed housing figures which would be delivered if the sites included in this supply are realistic commitments with the benefit of planning permission. The 'commitment' figure therefore lacks the level of robust certainty which ZBV would expect given that it makes up a significant proportion of the housing supply for the early part of the plan period.
- 1.32 The Settlement Extensions then make up the housing provision in its entirety for the period 2013/14 to 2016/17, including sites in the Green Belt, indicating that the Core Strategy anticipates the early delivery of new dwellings in the settlement extensions, yet leaving the definition and allocation of the Swanage and Bere Regis settlement extensions to later Development Plan Documents.
- 1.33 The CAP figures (some 710 dwellings) appear to be based on broad calculations (with significant blanket discounting) of unidentified sites within the top tier urban settlements only. This approach is no more than a very broad estimate of potential windfall development and is being used in policy HS and the Housing Trajectory to 'fill up' the total housing target delivery to

2026/27; particularly in the 2025-27 period. Without a published, detailed evidence base of the Character Area Potential, including the site areas examined, the Green Belt implications and the detailed findings of that testing and evaluation, it is ZBV's view that those figures should have no realistic weight in forming part of the housing supply for the Core Strategy.

- 1.34 Policy HS and the trajectory identify a total of 570 dwellings to be delivered through settlement extensions across the District thereby indicating, in ZBV's view, an over reliance on the delivery of housing through smaller-scale and windfall housing developments overall. This is unrealistic in terms of how the supply could be brought forward and it is not clear from Policy HS how it would actually be managed.
- 1.35 ZBV therefore conclude that the housing policy and the trajectory would require that the current commitments will need to be delivered in full and that the proposed settlement extensions will require planning permissions to be granted in 2012 at the latest in order to make an on-site start in 2013 with meaningful levels of completion secured in the same year.
- 1.36 Furthermore as suitable mitigation is not currently identified in the Core Strategy for all the proposed housing allocations (this is the case for Bere Regis, Bovington and Swanage), this could delay or prevent these settlement extensions coming forward.
- 1.37 The policy and trajectory are not a realistic reflection of the current situation or of the pace of housing delivery likely to occur in the District. The trajectory makes no allowance for flexibility or contingency in the supply of future housing land or for Character Potential Areas to contribute earlier in the plan period.
- 1.38 The housing supply and trajectory is therefore wholly dependent upon a theoretical programme of delivery on proposed allocations of strategic sites and yet to be identified settlement extensions, alongside a substantial number of unidentified sites in the Character Area Potential component of the housing trajectory.

- 1.39 On this basis ZBV questions the Core Strategy's ability to achieve its housing target (and particularly to meet affordable housing needs) with the proposed housing land supply in policy HS and in the trajectory given the absence of larger strategic sites which, as ZBV note elsewhere have been excluded from comprehensive and appropriate consideration in the preparation of the Core Strategy.

Character Area Potential and Windfall

- 1.40 The analysis and evidence underpinning the Character Area Potential dwelling figures are also of particular concern for ZBV. The CAP supply represents the largest component source of housing supply included in policy HS and in the housing trajectory (some 710 dwellings over the plan period).
- 1.41 There does not appear to be any actual published detail on how the CAP contribution has been calculated, specifically in terms of how it relates to the SHLAA and how this will be managed in terms of delivery. The CAP capacity is, in ZBV's view, effectively a proxy for windfall development, but one that fails to relate to the smaller settlements.
- 1.42 The basis for the analysis appears to be from the Townscape work undertaken for the major towns and is limited to development within the existing settlement boundaries of each.
- 1.43 There is little evident link in terms of published information as to how the SHLAA and the Character Area Potential analysis interact as the SHLAA makes no reference to the Character Area Potential work. This is further compounded in the Core Strategy and supporting evidence in Background Paper Volume 5: Housing Supply (August 2011) where references are made to the work, but without sufficient detail to understand its approach, scope or detailed findings.
- 1.44 For instance, it is noted at Core Strategy paragraph 6.4.2 that many of the CAP sites would be large enough to trigger the delivery of affordable housing (circa 310 affordable units are anticipated on such sites). However, it cannot

be proper, effective planning for the Core Strategy to rely on such an undefined and untested approach to future housing provision.

- 1.45 On this basis it is hard to conclude the degree of deliverability or developability of Character Area Potential sites; whether they should more correctly be considered as windfall site locations; and to understand the spatial pattern of delivery that their inclusion in the housing supply trajectory implies given there is no analysis of lower order centres and villages.
- 1.46 ZBV also note with concern that the Core Strategy makes reference at paragraph 6.2.1 to the large historic delivery rates of housing on windfall sites (averaging some 136 dwellings per annum); although a specific windfall allowance is not included in either policy HS or the housing trajectory.
- 1.47 ZBV consider that this rate of windfall is reflective of poor forward planning with a failure of the Council to identify and allocate sufficient new housing land supply both now and historically that would effectively reduce the need for windfall development. ZBV suggest that it is inappropriate for the Core Strategy to rely on significant levels of windfall development in future, which by their nature are usually small scale sites delivering one or two dwellings without contribution to necessary affordable housing, social or transport infrastructure. The Core Strategy should make provision to meet the District's housing needs in full and with the appropriate level of additional supply contingency as paragraph 47 of the NPPF requires. The Core Strategy should not therefore need recourse to windfall development, which as the Plan notes "predicting where and when it will occur is difficult".

Previously Developed Land

- 1.48 As ZBV have noted in response to Matter 4.2 previously, the SHLAA process and findings suggests that the method and depth of analysis undertaken to identify, test and evaluate the suitability, availability and achievability of potential housing sites on previously developed land was flawed resulting in a significant concern over the robustness of the housing land capacity and particularly whether those sites identified could be delivered viably.

- 1.49 On the basis of this flawed analysis of achievability in terms of deliverability and developability, the SHLAA concluded that it was unnecessary to complete a wider site search of greenfield locations as the those sites already submitted identified a potential surplus of housing land capacity in the District against the RSS and Draft Core Strategy housing targets. Policy HS and the housing trajectory are directly derived from this flawed SHLAA analysis.

Flexibility

- 1.50 Neither Policy HS nor the housing trajectory provide any realistic flexibility or contingency within them to secure alternative sites, phasing or delivery programmes for future housing growth. They are rigid and prescriptive in terms of location, phasing and anticipation of the full delivery of all housing prescribed to each strategic (and yet to be identified non-strategic site). Neither the policy nor the trajectory commit to any additional dwellings above the Core Strategy's target (which ZBV consider is far below the level required to meet housing needs). ZBV suggest this is unrealistic of developer expectations and market realities.

Conclusions

- 1.51 Taken together, Draft Core Strategy's failure to accord with the housing target established in the Regional Spatial Strategy or with current demographic household forecasts; the lack of certainty and flexibility in the housing trajectory; and the flawed approach contained within the SHLAA and Character Area Potential analyses raises concern that the future housing supply will not be achieved as envisaged in the Core Strategy.
- 1.52 ZBV therefore conclude that Core Strategy policy HS and the housing trajectory (and by extension Map 5) are unsound, as they are not:
- **Positively prepared**, the Plan fails to meet objectively assessed housing requirements which it is reasonable to expect the Core Strategy to do given the weight the NPPF applies to boosting the housing supply; and the significant weight the Core Strategy itself places on meeting housing needs in its vision, spatial objectives and underlying evidence base.

- **Consistent with national policy** in the NPPF – particularly paragraphs 14 and 47;
- **Effective** in demonstrating how the housing land supply will be met and delivered consistently and with suitable flexibilities and contingencies. The evidence base contained in the SHLAA and Character Area Potential analysis are flawed and fail to adequately justify policy HS or the trajectory;
- **Justified** in failing to plan for the most appropriate housing strategy based on the available, objective evidence of future housing requirements derived from demographic forecasts, the extant RSS and the SHMA.

1.53 ZBV consider it is unacceptable for Purbeck Council to fail to plan positively and in full for the delivery of housing. The Core Strategy requires a clear, unambiguous statement of the level of housing supply to be delivered to meet housing needs; and critically how this will be implemented with suitable flexibility and contingency. This should ensure that there is a clear, positive linkage between the implementation of policy HS, policy AH, the housing trajectory and Map 5.

4.4: PPS3: Housing suggests the potential for setting out a range of densities across the plan area. Should the Core Strategy establish the Council's overall approach to housing densities?

1.54 ZBV have no comments to submit with respect to the issue of housing density ranges.