



Purbeck Core Strategy Development Plan Document

Examination into the soundness of the plan

Statement on behalf of Purbeck District Council

Hearing date: Wednesday 9 May 2012 – 2pm

Matter 5: Affordable Housing and Gypsies and Travellers (Policies AH and GT)

Issues

- 5.1 There is a significant need for affordable housing in the District (3,060 requests) but only 780 affordable units are likely to be delivered during the plan period. How does the Council justify this large shortfall and has sufficient weight been attached to addressing this issue?
- 5.2 Is the Affordable Housing policy AH consistent with national guidance and supported by clear and robust evidence?
- 5.3 Have the needs of gypsies, travellers and travelling showpeople been adequately addressed in accordance with national advice? Are any of the criteria in policy GT unduly restrictive?

Introduction

1. This statement considers all the issues within Matter 5: Affordable Housing and Gypsies and Travellers (Policies AH and GT).

Statements of common ground

2. No statements of common ground have been submitted in relation to this Matter.

Why the Council considers the core strategy sound

3. Each issue raised by the Inspector is considered in turn below:

5.1 There is a significant need for affordable housing in the District (3,060 requests) but only 780 affordable units are likely to be delivered during the plan period. How does the Council justify this large shortfall and has sufficient weight been attached to addressing this issue?

4. The Core Strategy Proposed Changes to the Pre-submission showed in Map 5 that there were 3,060 household requests for affordable housing. Change 25 of the Minor Changes Schedule¹ updates this figure to 3,523. However, it is important to note that one household can make multiple requests in different parts of the District and therefore 3,523 is not representative of the number of individual households on the housing register. Change 24 of the Minor Change Schedule shows that the latest number of individual households on the register is 2,029 (November 2011).
5. Affordable housing delivery is a corporate priority for the Council². As explained in the Council's statement on Matter 4, the Council has agreed to plan for 2,520 dwellings over the plan period, which will comprise market and affordable housing. The Council objectively assessed the housing target, taking into account forecasted need and constraints posed by European protected sites. However, the Council's evidence³ does not provide certainty that growth over 2,520 dwellings can be mitigated effectively.
6. The Council needs to undertake further technical studies to explore higher growth options in Purbeck. However, to delay the Core Strategy for this work to take place will unnecessarily delay the delivery of affordable housing, which is needed now. Therefore, the Council submitted Core Strategy for examination, as there is greater certainty that the current housing target can be mitigated. The Core Strategy will deliver a significant new supply of affordable housing in the next five years.
7. The Council recognises that owing to the constraints placed by European Protected Sites, all housing needs cannot be met in Purbeck. Therefore, the Council has concentrated on maximising affordable housing as a proportion of the District housing target. This will be done by requiring all development of two dwellings and above to contribute 40-50% affordable housing (depending on the location in the District). Allocated housing sites will also provide 40-50% affordable housing.

¹ SD26: Minor Changes Schedule

² CD137: Purbeck Corporate Strategy (2011 - 2016)

³ CD143a: Appendix 1a- Nature Conservation Representations to the Secretary of State with regard to the Regional Spatial Strategy Proposed Changes on behalf of Purbeck District Council (2008); CD112: HRA Implications of Additional Growth Scenarios for European Protected Sites (2010)

Viability testing⁴ shows that these thresholds and proportions are deliverable. The allocated housing sites will provide a significant contribution of almost a third of the estimated 780 affordable homes that should come forward during the plan period.

8. In addition, the Council has set up a Policy Development Panel (PDP) to look at ways to further increase affordable housing delivery. In particular, as per paragraph 54 of the NPPF, the PDP is exploring the option for allowing some market housing on rural exception sites to facilitate significant affordable housing.
9. The Sustainability Appraisal⁵ recognises that the Core Strategy will not be able to meet all housing needs. The Council will continue to explore means for increasing affordable housing delivery through the outcomes of the PDP and possibly through considering a partial or early review of the Core Strategy to deliver further housing growth.

5.2 Is the Affordable Housing policy AH consistent with national guidance and supported by clear and robust evidence?

10. Policy AH was written to be consistent with PPS3, which has now been deleted. However, the Council considers that the policy is still consistent with the NPPF, which has superseded this PPS.
11. Paragraph 14 of the NPPF is explicit in requiring all housing needs to be met, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. As discussed above, there is no certainty that all needs can be met owing to constraints placed by European Protected Sites.
12. The affordable housing thresholds have been informed by viability testing, produced by Three Dragons on behalf of the Council. Three Dragons produced its first report in 2008 and updated it in 2010 and 2011 to reflect changing economic conditions and the Government's introduction of Affordable Rent. The viability testing shows clear reasoning behind its recommended percentage targets and site threshold. It takes into account various factors, such as residual values, build costs, developer profit, affordable housing contributions and other development contributions. The Three Dragons' methodology is robust, as it informed numerous Development Plan Document policies for other councils and has been through examination successfully.
13. Paragraph 50 of the NPPF requires that where a local planning authority identifies that affordable housing is needed, affordable housing should be provided on site, unless off-site provision or a financial contribution can be robustly justified. Policy AH already requires this and therefore is consistent with this aspect of the NPPF.
14. Paragraph 50 also requires affordable housing policies to be flexible to take account of changing market conditions over time. Policy AH is flexible to cope with changing circumstances because it allows for developers to question viability through an 'open book' approach. The open book appraisal can then be subject to independent verification. The policy sets targets of at least 40% or 50% affordable housing contribution and this provides flexibility for sites to deliver more. This is consistent

⁴ CD113 & 114: Purbeck DC Affordable Housing Viability Assessment (2008) and update (2010); CD115: Purbeck DC Viability Report Update – The Impact of Affordable Rent (2011)

⁵ SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-Submission 2011

with the Council's approach for maximising delivery of affordable housing as a proportion of the District target.

15. Upon adoption of the Core Strategy, the Council will make available online a viability toolkit that will be publicly accessible. This will allow developers to calculate the viability of their proposed scheme on the same basis as the Council and help speed up the planning application process.

5.3 Have the needs of gypsies, travellers and travelling showpeople been adequately addressed in accordance with national advice? Are any of the criteria in policy GT unduly restrictive?

Needs

16. Policy GT was written to be consistent with Circulars 01/2006 and 04//2007, but these have been deleted and superseded by new national policy entitled 'Planning policy for traveller sites' (March 2012). The Council considers Policy GT to be in general conformity with national advice and to provide a suitable local policy until completion of the Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocation Development Plan Document (DPD). The Council is committed to the production of a Dorset-wide DPD to confirm future needs and identify appropriate sites. Although the Core Strategy does not identify a five, ten and fifteen year supply of sites(as required by the NPPF), this is being addressed through the dedicated DPD. The Council considers Policy GT to be appropriate as interim policy for use while the new national requirements are fully addressed through production of the dedicated DPD.
17. Councils in Dorset are working together to provide sites for Gypsy and Travellers and jointly commissioned Anglia Ruskin University to produce a Dorset Gypsy and Traveller Accommodation Needs Assessment (GTAA)⁶. This produced an estimate of accommodation requirements, although Dorset councils raised concern that this overstated the need identified⁷. The Regional Spatial Strategy (RSS) review of pitch requirements in 2008 set out a target of 44 residential pitches and 21 transit pitches for Purbeck by 2011⁸. These levels were based directly upon data from the GTAA, but without account of the double counting, errors and other inconsistencies identified by the Dorset authorities. The Council believes that some adjustment is required to the GTAA and that pitch levels in Purbeck should be set at 20 residential pitches and 21 transit pitches⁹. This suggestion was due to be considered further during the final stage of RSS production, however this process was not completed due to the Government's proposed revocation of the RSS.
18. The Council considers that the revised pitch levels presented in the Core Strategy¹⁰ represents an appropriate assessment of the needs identified to 2011. Pitch level requirements for the remainder of the plan period will be assessed separately and

⁶ CD 109: Dorset Gypsy and Traveller Accommodation Needs Assessment (2007)

⁷ CD 142: Dorset authorities joint response to the RSS Proposed Changes 2008, paragraph 5.29

⁸ RSS Review of Additional pitch requirements (March 2008) Table 4.3, page 60

http://www.southwest-ra.gov.uk/nqcontent.cfm?a_id=3147&tt=swra

⁹ CD 143: Purbeck Response to the RSS Proposed Changes 2008, pages 51-55

¹⁰ SD 13: Proposed Changes to the Core Strategy Table 4, page 79

addressed through the Dorset-wide DPD¹¹. This will identify the most suitable sites to provide a five, ten and fifteen year supply of sites and a strategy for site delivery. Joint working with adjacent authorities will also help to ensure a consistent approach and selection of the most appropriate sites across the county.

19. The Dorset-wide DPD is well underway. The project was launched in April 2010 and the Issues and Options stage was undertaken between November 2011 to February 2012. Preferred Options are due to be prepared during 2012, with Adoption expected in 2014. Policy GT is intended to help determine any planning applications that might be made prior to completion of the above DPD.
20. The delivery of new Gypsy and Traveller sites in Purbeck is likely to be difficult. Following a 'call for sites'¹² and wider assessment, consultants identified four sites as 'available', 'suitable' and 'deliverable' in Purbeck. These sites were consulted upon as part of the Issues and Options and the Council is awaiting feedback from Baker Associates concerning these and any new sites suggested by respondents.
21. Extensive areas of constrained land in Purbeck make many potential locations inappropriate. This includes areas of internationally designated heathland (along with a 400m buffer zone) and the Green Belt. Further assessment of any potential new sites suggested as part of the Issues and Options consultation will be necessary and this will be undertaken during summer 2012.

Criteria

22. The criteria of Policy GT: Gypsies, Travellers and Travelling Showpeople has been drafted to provide flexibility in potential site location. Following consultation, comments were made concerning a lack of opportunity for consideration of rural site locations. As a result, the criteria have now been revised to enable both rural and edge of settlement locations to be considered. The Council considers that the range of on-site and off-site requirements specified is required in order to ensure appropriate development and to help promote community cohesion. Where a proposal does not fully accord with the criteria of Policy GT, it will be necessary for the applicant to demonstrate that the site is a viable and realistic option in order for the Council to be able to justify making a case for exceptional circumstances.
23. As with other residential development, Gypsy and Traveller sites will need to be located in sustainable locations in accordance with Policy LD. However, the Council recognises that there are difficulties in finding sites and some representations have suggested that the criteria has previously been too onerous to enable sites to be delivered. In response, the Council has suggested some amendments in the Minor Changes Schedule in order to provide additional flexibility. This will give applicants an opportunity to provide justification for any proposed site that does not meet the criteria set out in Policy GT. This would then enable an exception to be made where appropriate.

¹¹ Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocations DPD
<http://www.dorsetforyou.com/travellerpitches>

¹² Dorset-wide Gypsy, Traveller and Travelling Showpeople Site Allocations DPD
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Suggested changes for the Inspector to consider

24. Update as per changes 76-83 of the Minor Changes Schedule. In particular, change 78 clarifies that Policy AH only applies to a net increase of two dwellings; and change 79 provides an update in line with the NPPF to allow the reuse of rural buildings for housing. These two changes will be consulted on as a modification to the Core Strategy after the hearings have been completed.