

Purbeck Local Development Framework

Core Strategy Examination

Statement submitted by Savills on behalf of the Scott Estate (Swanage) on Matter 5:
Affordable Housing and Gypsies and Travellers (Policies AH and GT).

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Savills
Wessex House
Priors Walk
Wimborne
Dorset
BH21 1PB



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

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?

1. The overall level of growth proposed across the District falls short of meeting identified needs for market and affordable housing in Purbeck as indicated in the Strategic Housing Market Assessment Update (January 2011) and other indicators such as the latest ONS household forecasts, housing affordability, and the number of households on the housing register.
2. The evidence available points to an increasingly serious housing shortfall and a housing accessibility problem for Purbeck, and the wider housing market area, which will not be addressed by the spatial strategy proposed. It is critical for future generations that the Core Strategy takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs.
3. The NPPF advises (paragraph 159) that local planning authorities should have a clear understanding of housing needs in their area. This should include a SHMA to identify the scale and mix of housing which is likely to be needed over the plan period to: meet household and population projections, taking account of migration and demographic change; address the need for all types of housing; cater for housing demand and the scale of housing necessary to meet this demand. The SHMA update for the Bournemouth and Poole HMA (2012) includes a projection of household change (figure 7.6) 170 households per annum in Purbeck, this is a projection forward of past demographic trends and should be considered alongside other indicators of housing need and demand such as affordability and economic growth targets. Allowance also needs to be made for vacancy rates and second homes, which would be circa 8-10% for Purbeck. Chapter 6 of the SHMA provides a review of current and future affordable housing need across the HMA, the following figures from the SHMA highlight the scale of the issue for Purbeck:
 - Figure 6.4 indicates that there are a total of 1,427 households currently in unsuitable housing in Purbeck, approximately 7% of the total households in the

District, and has increased by approximately 230 households since the 2007 housing market assessment.

- Figure 6.6 shows that there are 617 households in housing need in Purbeck that need to move and cannot afford entry level housing whether owned or rented.
 - Figure A4.2 shows that the net annual affordable housing need in Purbeck has risen from 409 in 2007 to 520 in 2011.
4. Whilst the SHMA considers that part of the gap between the likely future need for affordable housing and future supply is likely to be met by the Private Rented Sector, it also highlights that the Private Rented Sector is not the solution to the clear need and affordability problem in the HMA (paragraph 6.74).
 5. The extent to which the Private Rented Sector (PRS) can meet the gap between affordable housing need and affordable housing provision is not defined in the SHMA. However, it should be noted that the PRS in Purbeck currently accounts for 3,008 households (15%) of the overall total of 19,972. Although the PRS has potential to expand, only a proportion of this sector is servicing households in affordable housing need, and if were to expand at a rate necessary to meet forecast needs, it would account for over 50% of the District's housing stock by the end of the plan period – clearly and unrealistic expectation. It is therefore unrealistic and undesirable to rely on the PRS to meet any more than a small proportion of the gap. A significant level of housing need will remain unmet. Increasing the overall housing provision by identifying additional land for housing at appropriate and sustainable locations will help to meet these needs.

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

6. Paragraph 8.4.2 of the supporting text to the Affordable Housing states: 'The south and east coastal areas have higher land values that can support a minimum target of 50% affordable housing provision'. Policy AH requires At least 50% affordable housing contributions in the Swanage and coast sub-market areas. The Council's basis for splitting the district into two areas and requiring at least 50% across such a large area is too simplistic. It does not recognise the lower land values in Swanage which the Council acknowledge is a remote location. Viability considerations also need to take into account

other costs such as contributions to the Purbeck Transport Strategy and the Dorset Heathlands Interim Planning Framework, and the difficulties in achieving high proportions of affordable housing in current economic conditions; it is noted that the neighbouring Borough of Poole has had a 40% affordable housing policy in place for some time but as yet no sites have been able to deliver this level of provision.

7. Government policy in relation to affordable housing has changed in the NPPF and a more flexible approach is required in order to ensure the Core Strategy remains consistent with national guidelines and initiatives. The NPPF states in paragraph 50 that affordable housing policies 'should be sufficiently flexible to take account of changing market conditions over time'. The affordable housing contribution percentages set out in Policy AH should therefore be expressed as targets, subject to viability considerations, rather than minimum requirements.