

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

Reference: 4953

MATTER 5: AFFORDABLE HOUSING AND GYPSIES AND TRAVELLERS (POLICIES AH AND GT)

- 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.

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?

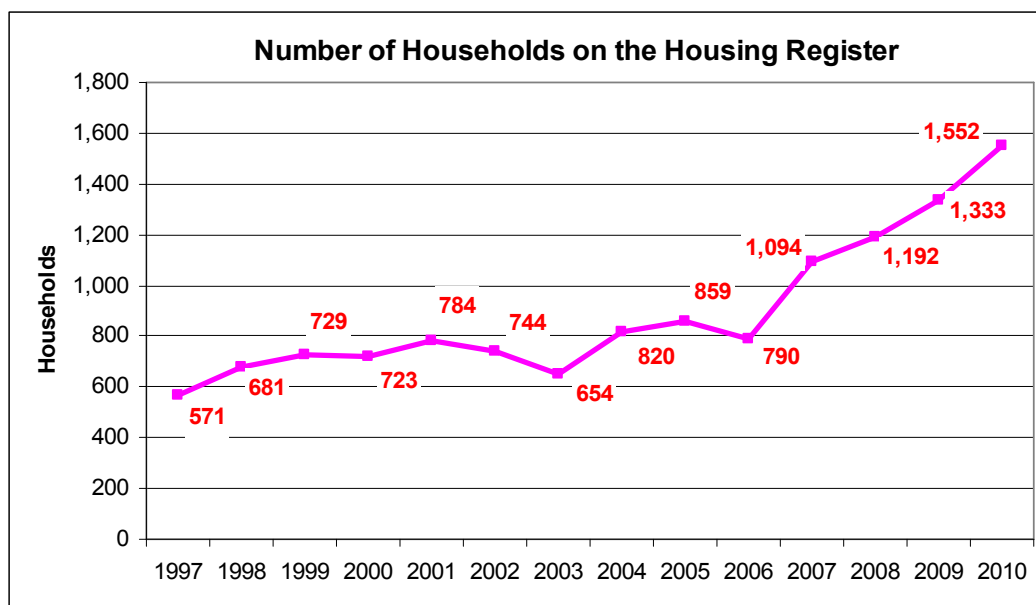
The Scale of Affordable Housing Need

- 1.2 The Dorset Strategic Housing Market Assessment (May 2008) has highlighted the acute housing access and affordability issues within Purbeck. This is further supported by the Council's latest Annual Monitoring Report (December 2010) which notes at page 3: "current data continues to show that one of Purbeck's most pressing problems is housing provision. Issues have been identified regarding the cost of housing and the shortage of housing for rent".
- 1.3 The Core Strategy itself indicates the importance and weight to be attached to meeting housing needs through the Vision for Purbeck and in Spatial Objective 2.
- 1.4 The Annual Monitoring Report (2010) (page.20), sets out that the average 2-3 bedroom house price in 2009 was 5.5 times the average household income of

households aged 20-39, higher than the Great Britain (4.7) and South West regional (5.38) averages.

- 1.5 The 2011 SHMA (Summary Report for Purbeck District) estimates that 25.3% of all current households in Purbeck cannot afford housing at current market prices/rents without subsidy. Affordability varies significantly by household sub-group, but it is clear that housing affordability remains a critical issue.
- 1.6 Figure 1 below shows that the number of households on the Council's Housing Register has also increased to 1,552 in 2010 from 790 households in 2006. The latest available information from DCLG (2011, Housing Strategy Statistical Appendices) is that the housing waiting list has increased further to 1,804 households in the District in 2011.

Figure 1: Number of Households on the Housing Register in Purbeck District, 1997 – 2010



Source: DCLG Housing Strategy Statistical Appendices, 2010

- 1.7 This is in part a result of an increase in households unable to access mortgage finance due to deposit and lending restrictions, but also a decrease in the delivery of new affordable housing stock in the District.

- 1.8 Future population and household projections for Purbeck show an increase over the plan period to 2027 of which it is reasonable to assume a significant proportion will require affordable housing in future. The 2011 SHMA provides an estimate of this future affordable housing need for the District, concluding that a total of 520 dwellings per annum would be required in the next five year period to meet the objectively identified housing need. This figure is substantially above the total market and affordable housing supply target proposed in the Core Strategy (120 dwellings per annum), leaving a significant and unresolved gap in affordable housing provision for Purbeck.
- 1.9 The 2010 Purbeck District Annual Monitoring Report provides the Council's most recent stated position on the delivery of affordable housing. It identifies that "during 2009/10 there was a large reduction in the number of affordable homes completed with only 22 provided overall". It continues "the drop in provision is well below requirements, and also reflects the fact that most housing delivered in Purbeck is on small-scale developments of one or two dwellings. These small sites fall below the adopted affordable housing threshold".
- 1.10 The 2011 SHMA Summary Report for Purbeck District Council provides a further update of the affordable housing delivery position (Figure 2.2) identifying a strongly decreasing trend in provision over the period 2007/8 (48 completions) and 2010/11 (eight completions), with a total of 136 affordable dwelling completions in that period.

Core Strategy Response to Meeting Affordable Housing Need

- 1.11 Core Strategy policy AH establishes a 0.05 Ha site size threshold and a 2+ dwelling base as the threshold for the provision of affordable housing. The policy states that at a contribution of at least 40%, or at least 50% (in the Swanage and Coast sub-market areas) will be affordable housing provided on-site in the first instance. ZBV are concerned that while the thresholds and level of contribution proposed are intended to generate substantial levels of new affordable housing, there are insufficient sites of a suitable scale

identified in the Plan, or the supporting evidence base, to deliver the levels of affordable housing required. Past low levels of affordable housing delivery in the District re-inforce this position.

- 1.12 Map 5 of the Core Strategy sets out the proposed distribution of future affordable housing supply indicating a total of 633 affordable dwellings to be built (2010-26). This is inconsistent with the total number of affordable dwellings to be provided stated in paragraph 6.4.3 where 780 dwellings are anticipated. In either case, when compared with the total household requests (3,060) the shortfall in provision planned is substantive, with only 20% - 25% of total household requests for affordable housing being proposed. Across the five spatial areas in Map 5, the level of affordable housing supply varies between 6% (in South West Purbeck) and 27% (in the South East area).
- 1.13 The Plan states at paragraph 6.4.4 that “the number of affordable dwellings proposed through the Core Strategy will fall short of current need” and yet it does not adequately justify why the shortfall should remain unresolved or attempt to explore alternative solutions or routes to meet identified housing need. This is further compounded, in ZBV’s view, by the fact that there is no Housing Implementation Strategy or other proactive plan in or allied to the Core Strategy that details how the housing trajectory for affordable housing (or indeed other housing tenures) will be delivered in the plan period or how affordable housing will be spatially directed to the areas of need identified in the SHMA.
- 1.14 In summary, ZBV consider that the substantial scale and need for affordable housing in Purbeck is:
- Fully recognised in the Strategic Housing Market Assessment 2008 and its 2011 update which were both compiled in accordance with national guidance;
 - Identified as a key issue and objective in the Core Strategy Vision for Purbeck and in Spatial Objective 2 but not adequately planned for in policy AH or the reasoned justification text of the Plan;

- At an acute level now in terms of overall affordable housing need and forecast to increase significantly during the plan period as new households form in the District;
- Exacerbated by past under-delivery of new affordable dwellings over the period from 2007 on a declining trend;
- Not reflected in a Housing Implementation Strategy, or in the District's proposed housing trajectory as required by the NPPF; and
- Affordable housing needs, including the opportunity for low cost market housing are unlikely to be objectively met by the Core Strategy based on policy AH as drafted which lacks an effective, justified approach to delivery and implementation in a proactive, positive manner.

1.15 ZBV conclude that the Core Strategy fails to meaningfully address the need for affordable housing in the District. The level of housing need is acute and has become more so during the period from 2006/7 to 2012. The Core Strategy's vision and spatial objectives clearly identify the importance of meeting Purbeck's housing needs (spatial objective 2) and reinforce this at paragraph 6.4.4 and in Map 5; yet the Plan fails to demonstrate a positive or proactive policy approach, analysis of alternatives or flexibility (either in policy AH or in policy HS) to objectively meet such needs. This fails to meet the requirements of the NPPF set out in paragraphs 47 and 156.

1.16 ZBV is concerned that the Council is failing to plan for affordable housing now and in the future. The level of affordable housing supply completed since 2006 has failed to meet the current housing needs of the District. The total future planned supply will not meet newly arising affordable housing need as the 2008 and 2011 SHMA's both clearly identify. The supply and distribution of sites contributing to affordable housing is unclear and the Plan's affordable housing delivery mechanism relies wholly on securing large contributions from private sector residential and mixed use developments. This, as ZBV conclude elsewhere in its submissions to this EiP, fails to adequately address the overall

requirements for new affordable housing in the District arising from forecast demographic trends.

- 1.17 On this basis, ZBV consider that the Plan is unsound as it does not meet its stated objectives, underplays the significance of affordable housing to sustainable development and fails to accord with the NPPF.

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

- 1.18 National guidance on affordable housing is contained in the National Planning Policy Framework (NPPF). There are a number of relevant sections:

- Section 6, paragraph 47. Local authorities are “to boost significantly the supply of housing”. In doing so, the NPPF requires that authorities should “use their evidence base to ensure that their Local Plan **meets the full, objectively assessed needs for market and affordable housing** in the housing market area...including identifying key sites which are critical to the delivery of the housing strategy over the plan period” [our emphasis].
- Paragraph 50 identifies the need to deliver a wide choice of high quality homes, with authorities planning for a mix of housing based on current and future demographic trends...and the needs of different groups.
- Paragraph 156 of the NPPF is also relevant to affordable housing as it clearly identifies the need for local authorities to set out the strategic priorities for the area, including “**the homes and jobs needed in the area**” [our emphasis].
- Paragraph 159 considers housing in the Local Plan making context. It confirms the role of the SHMA in identifying the scale and mix of housing and the range of tenures likely to be needed.

- 1.19 Policy AH and its reasoned justification are apparently underpinned by evidence contained in the Strategic Housing Market Assessment (2008) (SHMA) and the Dorset Survey of Housing Need and Demand Local Authority

Report for Purbeck District Council (2008). The 2008 SHMA was prepared in accordance with DCLG Practice Guide (August 2007). An updated SHMA was prepared in 2011 and published in 2012 again in conformity with national guidance.

- 1.20 As ZBV note in response to Matter 5.1 above, the 2008 SHMA identified a total affordable housing need of 409 dwellings per annum (2007-12). The 2011 SHMA identifies an increased need for 520 dwellings per annum using a modelling approach compliant with CLG Practice Guidance. ZBV are content that the findings of the SHMA evidence documents and their conclusions are considered to be robust.
- 1.21 It is not then an issue that Purbeck District Council lacked available evidence of affordable housing need, rather a matter of how this information is not systematically used in a positive manner to meet those needs through policies AH, HS and AHT and set out in the Housing Trajectory and in Map 5.
- 1.22 There is no alternative or supporting evidence provided in the Core Strategy or its evidence base to show that affordable housing need has declined or that demographic change coupled with lack of affordable housing delivery will not continue to compound the affordability pressures in Purbeck.
- 1.23 The Plan fails to adequately address the fact that affordable housing and low cost market housing delivery requirements are not being met, in accordance with national guidance and local evidence as the Plan fails to give sufficient weight to the provision of a suitable range, choice and extent of residential or mixed use sites capable if meeting need. As ZBV set out elsewhere in its EIP submissions, the identification and allocation of potential housing sites through the SHLAA and the Core Strategy itself is flawed; it fails to identify and support opportunities for an adequate range of larger and smaller sites to come forward and ignores the potential of some potential previously developed sites (such as Dorset Green Technology Park) to provide residential development, including affordable housing contributions altogether. Environmental and habitat issues are used as a reason to excuse the Council

from meeting national housing objectives and guidance and from meeting locally identified housing needs that the Core Strategy and SHMA evidence **all** identify is required.

1.24 ZBV considers that while the underlying evidence contained in the SHMA and its update were robustly derived in accordance with national guidance, policies AH and HS (as this establishes the overall housing supply and trajectory for the District) of the Core Strategy have failed to effectively use and interpret this available information into policy. On this basis, the Core Strategy's policies are not consistent with national guidance or with its own, robust locally derived evidence base.

1.25 ZBV conclude that Core Strategy policies AH (and by extension policy HS and Map 5) are unsound as they are not:

- **Positively prepared**, the Plan fails to meet objectively assessed affordable housing development 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 47, 50, and 156;
- **Effective** in demonstrating how affordable housing needs will be met and delivered consistent with the Core Strategy Vision for Purbeck and Spatial Objective 2;
- **Justified** in failing to plan for the most appropriate affordable housing strategy based on the available, objective evidence of the SHMA.

1.26 ZBV consider it is unacceptable for Purbeck District Council to fail to plan positively for the delivery of affordable housing and furthermore to leave the detail of such requirements to a subsequent Supplementary Planning

Document. The Core Strategy requires a clear, unambiguous statement of the level of affordable housing supply to be delivered; the tenures proposed and critically how this will be implemented. This should ensure that there is a clear, positive linkage between the implementation of policy AH, policy HS and Map 5.

5.3: Have the needs of gypsies, travellers and travelling showpeople been adequately addressed in accordance with national advice, particularly in Circulars 01/2006 and 04/2007? Are any of the criteria in policy PCS21 unduly restrictive?

- 1.27 ZBV do not wish to make any comment with respect to the needs of gypsies, travellers and travelling showpeople.