### **Purbeck Local Development Framework**

## **Core Strategy Examination**

Statement submitted by Savills on behalf of the Scott Estate (Swanage) on Matter 16: South East Purbeck (Policy SE).

Respondent reference: 2538

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#### Matter 16: South East Purbeck (Policy SE)

16.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

- 1. As set out in our statement in relation to Matter 4, 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.
- For the South East Purbeck area in particular, it is noted that the revised Map 5 (change no. 25 in the Minor Changes Schedule) indicates that there are currently 936 households on the housing register (November 2011), whilst the plan only proposes to deliver 252 affordable dwellings.
- 3. The evidence available points to an increasingly serious housing shortfall and a housing accessibility problem for Swanage, Purbeck, and the wider sub-region, which will not be met by the proposed Policy SE. 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. The availability of a suitable, sustainable and deliverable site for new housing at Swanage should be taken into account and the policy adjusted accordingly, as set below.

16.2 The allocation of 200 dwellings at Swanage is considered by the Council to be not of strategic importance. Is this an appropriate approach and is it reasonable to rely on a 'subsequent plan' for the residential allocation?

- 4. In the context of Purbeck District, with its acknowledged housing needs, environmental constraints, and limited opportunities for new development, we consider that the location of settlement extensions to Swanage is a strategic consideration that requires allocation through the Core Strategy.
- 5. The lack of a strategic site allocation at Swanage is inconsistent with the approach taken elsewhere in the plan. The scale of settlement extension(s) planned for Swanage (200 dwellings) is greater than strategic allocations identified at Lytchett Matravers (50

dwellings) and Upton (70 dwellings) and equal to the strategic allocation identified at Wareham (200 dwellings).

- 6. Swanage is the largest town in Purbeck, it sits at the top of the settlement hierarchy and has significant growth needs. It lies within the Area of Outstanding Natural Beauty, whilst the Jurrassic Coast World Heritage Site and the historic character of the town provide further constraints to development. The identification of appropriate and sustainable locations for the future growth of the town is therefore considered fundamental to the overall soundness and deliverability of the Core Strategy.
- 7. The proposed approach of relying on a subsequent plan to deliver settlement extension(s) of 200 dwellings and community facilities at Swanage is not consistent with paragraph 153 of the National Planning Policy Framework (NPPF), which advises that additional development plan documents should only be used where clearly justified. Furthermore, this approach is not consistent with paragraph 154 of the NPPF as it does not provide a clear policy on what will or will not be permitted where and does not provide a clear indication of how a decision maker should react to a development proposal.
- 8. Policy SE: South East Purbeck notes that the location of any housing outside the existing settlement boundary should have regard to the results of the Where shall we build in Swanage? consultation in June 2010. It should be noted that the Council's preferred option identified a combination of development at Washpond Lane and the former grammar school site.
- 9. Since this consultation, proposals for both of these sites have moved forward considerably. It is understood that government funding for the Education Swanage free school proposals has been secured, and the re-use of former grammar school building and part of the grounds for the new school has been agreed with the owners, with only the remaining part of the site being promoted for housing. The Scott Estate's proposals for Washpond Lane have also been revised and updated to respond to the issues identified in the consultation, as set out in our previous submissions on policy SE; land at Washpond Lane can deliver significant community benefits including healthcare provision, public open space, allotments, community facilities, sustainable transport linkages, and much needed new homes, including family homes and affordable housing. Both sites should be identified in Core Strategy Policy SE.

10. It should also be noted that there are smaller scale proposals for changes to the settlement boundary at Swanage, such as the Scott Estate proposals for Prospect Farm, that can contribute to meeting identified housing needs in a sustainable manner.

#### Changes required:

11. In order to ensure that a flexible and responsive supply of land is available, and to make the clear spatial choices on the location of new development that are needed in the Core Strategy, Policy SE should include clear reference to the location of the strategic settlement extensions to Swanage that are needed to implement the plan. This should include: the re-use of the former grammar school site for a free school, with associated housing development on part of the site; a strategic allocation for new housing, public open space, healthcare and community facilities at Washpond Lane (site boundary as per our previous representations and as identified in SHLAA site ref 6/20/0200), and; provision for smaller scale changes to settlement boundaries such as land at Prospect Farm (site boundary as per SHLAA site ref 6/20/0192).

# 16.3 Has the relationship between housing and employment provision in Swanage been properly explored?

- 12. It is unclear to what extent the relationship between housing and employment provision in Swanage has been explored. Swanage is noted as having a high degree of self containment, although the Core Strategy also highlights concerns in relation to an elderly population, and low wages based on tourism jobs.
- 13. The *Economic Context* background paper notes at paragraph 1.6.3 that the Prospect Business Park will offer an important opportunity for local employment growth, as there has been a shortage of employment land within the area. However, it also considers that identifying further suitable sites around Swanage is difficult because of a variety of landscape, flooding and residential amenity constraints and the remoteness of the town.
- 14. It should be noted that in addition to the traditional B-class employment uses, other sectors such as healthcare and education make an important contribution to the local economy. The Scott Estate's proposals for Washpond Lane include a mix of uses that will contribute to meeting economic and community needs. This includes the potential for improvements to education and community facilities, and the provision of healthcare

facilities including integrated primary care centre and a community hospital, extra-care apartments, and elderly care facility. The provision of suitable housing, including family homes and affordable homes with on-site open space provision will be an important factor in attracting new businesses to the area, allowing existing businesses to expand, and creating local construction jobs as the development is built.