

Mrs. J. Neale,  
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**BY POST & EMAIL:**  
**JennyNeale@purbeck-dc.gov.uk**

13156/A3/NPN/slh

19<sup>th</sup> June, 2012

Dear Jenny,

**PURBECK DISTRICT SUBMISSION CORE STRATEGY EIP RESPONSE TO PURBECK DC NPPF STATEMENT ON BEHALF OF ASHVILLA ESTATES (WAREHAM) LTD: RESPONDENT REFERENCE 2799.**

On behalf of our client, Ashvilla Estates (Wareham) Ltd., we write to set out our response to the Purbeck DC NPPF statement as invited to do so by the Inspector.

Our hearing statements, especially to matter 1, have set out our views in terms of the NPPF and the effect of the Government's national planning policy guidance on the draft Core Strategy and we do not seek to repeat these representations.

There are however, a small number of additional comments which we wish to remark upon in respect of the Council's NPPF statement.

The Council's view set out in paragraph 2.7.1 and paragraph 2.15.4 sets out that Natural England's advice on the level and location of development which can in their view be successfully mitigated has clearly led the level of housing growth proposed in the draft Core Strategy. It has been evident from the hearing sessions that great reliance has been placed on this factor as one which in the Council's view prevents them from meeting objectively assessed housing needs.

The statement in paragraph 2.18.1 that the Core Strategy has been positively prepared to meet objectively assessed needs is not supported by evidence and the following sentence accepts a shortfall in meeting housing needs. The Council has had sufficient time to consider deliverable solutions in the period since 2004 (when a prompt review was promised) and the proposition that further work will result in undue delay to delivery of housing is not accepted: a review of the evidence and reasonable alternatives must be undertaken now as part of this Examination and through further Main Modifications as required.

The commitment to a partial review (paragraph 2.18.1) of the Core Strategy (also now Main Modification 2) starting at the end of 2015 is insufficient to meet needs which exist now. This work should have been done in the period prior to the EiP. There is no clarity on the duration of the review itself, but one assumes a further EiP would be needed in late 2016 and of course statutory public consultation, which means in reality the Core Strategy, would be unlikely to be updated in its new form until 2017 at the earliest. This will not address current objectively assessed need.

In our view perceived constraints on growth should not be determinative in establishing the housing requirement. Constraints do not derive actual need for dwellings, but rather they inform the arrangements for their provision. We, and others at the EiP, have identified potential ways in which the Council can provide sufficient growth to meet objectively assessed need which ensures that the ecological designations (particularly the Dorset Heaths SPA) can be protected from recreational pressure through the application of SANGs. In the case of our client, our statement to matter 14 details the strategic Frome Valley SANG proposal at Worgret Manor to the west of Wareham. The identified housing need can be addressed in a sustainable way. PDC has failed to justify adequately why it is not addressing the evidence of housing need and has not justified the proposed strategy when considered against the reasonable alternatives: which it has failed to fully consider.

We raised concern in matter 4 hearing session that the plan is failing to meet housing need, with 1 in 4 households unable to live without subsidy, a high housing waiting list and annual unmet housing need for affordable homes. The mismatch between homes and jobs is also a concern: there is not enough lower cost housing to support employees in key service sectors of the economy. We also raised concern that the Council has a track record of persistent under delivery of housing and there was a high reliance on windfalls. The Council's effective claim in paragraph 2.7.1 and 2.7.6 that they do not have a record of persistent under delivery (NPPF paragraph 47) (reference is made to a 5% buffer rather than 20%) is not accepted and will be subject to further representations in the context of the Main Modifications consultation.

I hope that this is clear and helpful.

Yours sincerely,

**NICK PATERSON-NEILD**  
Associate

Enc 2 copies of letter

cc: P. Davenport, Esq. - Ashvilla Estates (Wareham) Ltd.  
P. Colebourn, Esq. - EPR