

Purbeck Local Development Framework

Core Strategy Examination

Statement submitted by Savills on behalf of the Redwood Partnership in response to Purbeck District Council's Statement on the implications to the Core Strategy of the publication of the National Planning Policy Framework (NPPF).

Respondent reference: 4948

June 2012

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Implications to the Core Strategy of the publication of the National Planning Policy Framework (NPPF)

1. Introduction

- 1.1 This submission been prepared on behalf of the Redwood Partnership as a supplement to previous representations on the Pre-Submission Core Strategy and statements submitted in response to the issues identified by the Inspector for discussion at the Core Strategy Examination hearing sessions.
- 1.2 The purpose of the submission is to review the issues raised in Purbeck District Council's statement on the implications for the Core Strategy of the Department for Communities and Local Government's National Planning Policy Framework (NPPF), which was published and took effect on 27 March 2012.
- 1.3 This submission follows the order of guidance offered by the NPPF, and employs the same headings. Relevant guidance is quoted in italics, and the commentary on behalf of the Redwood Partnership follows in bold text.

2. Comment on relevant provisions of the NPPF 2012

Ministerial Foreword

- 2.1 The Ministerial foreword on page (i) opens with the statement that *'The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations. Development means growth.... We must house a rising population, which is living longer and wants us to make new choices. ...'*
- 2.2 **COMMENT: The evidence available points to an increasingly serious housing shortfall and a housing affordability problem for Purbeck. This is not adequately addressed by the Core Strategy; as a consequence, opportunities for future generations to access suitable housing will worsen.**
- 2.3 The Ministerial foreword goes on to explain that *'sustainable development is about positive growth – making economic, environmental and social progress for this and future generations'*. The purpose of planning *'is about making this happen'*. The presumption in favour of sustainable development *'is the basis for every plan, and*

every decision'. In helping to achieve sustainable development, *'planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.'*

- 2.4 COMMENT: The full range of options for delivering sustainable growth to meet current and future needs have not been adequately explored through the process of preparing the Core Strategy and as a consequence the plan has failed to take account of genuine opportunities to deliver sustainable growth and to improve and enhance the quality of life within the District.**

Achieving sustainable development

- 2.5 NPPF paragraph 6 reiterates that *'The purpose of the planning system is to contribute to the achievement of sustainable development'*. Paragraph 7 sets out three dimensions to sustainable development: economic, social and environmental. Para 8 explains that these roles should not be undertaken in isolation, and *'that to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.'*
- 2.6 COMMENT: As set out in our statement on Matter 4: Housing, we are concerned that the Core Strategy does not make adequate provision for the supply of housing required to meet the needs of present and future generations. The proposals put forward by the Redwood Partnership and the Lulworth Estate in the Wool Vision document, and in the subsequent representations by Savills on behalf of the Redwood Partnership, would contribute to each of the three dimensions of sustainable development to deliver economic, social and environmental gains. The failure of the Core Strategy to recognise such an opportunity therefore raises a significant concern over its soundness.**
- 2.7 NPPF paragraph 9 highlights that sustainable development involves *'seeking positive improvements in the quality of the built, natural and historic environment, as well as seeking positive improvements to people's quality of life, including (but not limited to): improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes'*. Para 10 notes that *'plans and decisions*

need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.'

- 2.8 COMMENT:** As highlighted in our statement in response to Matter 4: Housing, the Core Strategy fails to deliver the right numbers and mix of housing to meet local needs. The Core Strategy will result in a significant shortfall in housing provision that cannot be met by the private rented sector and which is likely to give rise to associated problems of overcrowding, people living in sub-standard accommodation, social exclusion, homelessness and out-migration of younger people and families. The proposals put forward by the Redwood Partnership represent an opportunity to help to address these issues, thereby improving the quality of life for residents whilst delivering improvements in the quality of the built, natural and historic environment.

The presumption in favour of sustainable development

- 2.9** The presumption in favour of sustainable development set out at paragraph 14 of the NPPF means that for plan making:
- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
 - *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.*
- 2.10 COMMENT:** The level of housing proposed in the Core Strategy falls short of providing sufficient housing to meet identified community needs, despite the availability of suitable sites and locations for development that could be delivered in line with the policies in the NPPF, as a result the Core Strategy fails to meet a cornerstone of national policy. Although European protected sites do pose a constraint to growth in certain parts of the District, there are nevertheless opportunities for development that could be delivered in line with the Habitats Regulations, as evidenced by the *Implications of Additional Growth Scenarios for European Protected Sites* (Footprint Ecology, September 2010) which identifies the potential to accommodate 1,000 new homes at Wool. In this respect, paragraph 2.1.1 of PDC's statement is factually incorrect, and

inconsistent with the explanation given at the examination hearing session, which was simply that at the time the Footprint ecology report became available, the Council's priority was to progress the Core Strategy as expediently as possible and therefore chose not to address the potential for further growth at Wool. An unavoidable consequence of this approach is that the Core Strategy and the associated Main Modifications proposed by the Council cannot be considered sound as they do not comply with the requirement of the NPPF to meet objectively assessed housing needs, despite the availability of suitable opportunities at Wool.

- 2.11 Paragraph 15 of the NPPF repeats that all plans should be based on the presumption in favour of sustainable development, *'with clear policies that will guide how the presumption should be applied locally.'*
- 2.12 **COMMENT: The proposed inclusion of the model policy wording provided by the Planning Inspectorate would address this point and is supported.**

Core Planning Principles

- 2.13 Para 17 of the NPPF sets out the core land use planning principles that should underpin plan-making, bullet point three of which states that planning should:
- *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;'*
- 2.14 **COMMENT: It is clear from the evidence available, as highlighted in our previous representations and statements, that the housing provision in the Core Strategy falls short of meeting objectively identified housing needs, despite the availability of suitable opportunities for growth at Wool. The plan has failed to plan positively for the range of opportunities for growth available, and has not set out a clear strategy for allocating sufficient land which is suitable for development.**

Delivering sustainable development

1. Building a strong, competitive economy

- 2.15 Paragraphs 19 and 20 of the NPPF emphasise the Government's commitment to *'ensuring the planning system does everything it can to support sustainable economic growth'*, highlighting the need to plan proactively to meet development needs.
- 2.16 Paragraph 21 elaborates on this, stating that *'Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.'* Subsequent bullet points include a requirement for local planning authorities to *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth'* and that *'Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.'*
- 2.17 COMMENT: As highlighted in our previous statements, we are concerned that the plan does not identify sufficient land to meet development needs, and that there is no flexibility to adapt to changing circumstances. This uncertainty is highlighted by paragraph 2.2.3 of the Council's statement, which acknowledges the need to prepare an economic strategy consistent with the emerging LEP strategy to inform subsequent plans, but does not make any firm commitment to doing this. Furthermore, the plan does not provide a clear vision for economic growth in relation to the Dorset Green Technology Centre and the surrounding area, and does not address the important link between employment growth and housing provision.**

Delivering sustainable development

4. Promoting sustainable transport

- 2.18 Paragraph 37 of the NPPF advocates planning for a balance of land uses to encourage sustainable travel patterns, stating that *'Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.'*
- 2.19 COMMENT: Purbeck District Council's statement indicates that the Core Strategy plans to improve the self sufficiency of each spatial area by**

concentrating growth at the towns and key service villages that act as service centres to the surrounding rural area. However, as noted in our statement on Matter 15, there is a significant imbalance between planned housing provision and employment provision in the South West Purbeck area. Dorset Green Technology Park represents a strategic employment site with potential for considerable jobs growth, however housing provision in the area falls short of meeting identified needs, constraining growth potential. The Core Strategy is therefore inconsistent with paragraph 37 of the NPPF.

Delivering sustainable development

6. Delivering a wide choice of homes

- 2.20 Paragraph 47 of the NPPF sets out a list of measures required of local planning authorities in order to boost significantly the supply of housing. The first bullet point includes a requirement to *'use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'*
- 2.21 **COMMENT:** As set out in our statement in response to Matter 4: Housing, all the evidence available, in particular the SHMAA (2008 and 2011) and the housing register, points to an increasingly serious housing shortfall and housing accessibility problem in Purbeck and the wider housing market area, with a significant gap in affordable housing provision that will not be met and will result in problems such as overcrowding, sub-standard housing, social exclusion, homelessness and out-migration of younger people and families. Despite the availability of suitable, sustainable and deliverable sites for new housing at Wool, as identified in the SHLAA and the *Where shall we build in Wool?* consultation, the Core strategy has failed to respond positively to the consultation response, the identified needs of the area, and the opportunities for growth that are available.
- 2.22 The second bullet point of paragraph 47 requires local authorities to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the*

market for land...’ The third bullet point requires the identification of a supply of *‘specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15’.*

2.23 COMMENT: As set out in our Statement in response to Matter 4: Housing, and given the justified concerns raised at the hearing sessions in relation to the deliverability and timing of the Green Belt settlement extensions, we do not consider that the Council has identified a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

2.24 Paragraph 48 of the NPPF makes an allowance for the inclusion of windfall sites within the five year land supply as follows: *‘Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.’*

2.25 COMMENT: The five year supply of housing put forward by the Council does not include allowance for the inclusion of windfalls. This approach is supported as there is not considered to be ‘compelling evidence’ for the inclusion of windfalls. Current economic conditions, the introduction of affordable housing policies, the lack of sites identified in the SHLAA, and the specific requirement of the NPPF not to include residential gardens as windfall sites indicate that windfalls cannot be considered a reliable source of supply for the District, and any inclusion of windfalls within the land supply would severely compromise the deliverability of the plan. Furthermore, the NPPF does not provide any basis for the inclusion of windfall sites within housing provision for the period beyond 5 years.

2.26 Paragraph 50 of the NPPF sets out measures *‘To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities’* including the following bullet points:

- *‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but*

not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);

- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand....'*

2.27 COMMENT: The SHMA Update 2012 estimates that 45-58% of the overall housing requirements (market and affordable) are for 3 and 4+ bed properties, and that this mix should be reflected in the portfolio of sites taken forward through Local Plans. The growing unmet need for larger family housing is a recognised issue, but is not adequately addressed by the Core Strategy or the Council's proposed modification to paragraph 6.3.2 of the plan. Due to the substantial shortfall in the provision of housing in the plan when compared to identified needs, the Core Strategy will not be effective in providing for a suitable mix of new housing.

2.28 Paragraph 52 of the NPPF highlights the potential of settlement extensions as a means of delivering the supply of new homes, stating *'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.'*

2.29 COMMENT: The Council has failed to give appropriate consideration to the opportunity to provide for larger scale development at Wool, which has the potential to make a significant contribution to meeting the District's identified housing needs. Such an approach could also deliver significant benefits in terms of improving access to open space and recreational opportunities, as illustrated in the Wool Vision document submitted alongside our previous submissions.

Plan-making Local Plans

2.30 Paragraph 151 of the NPPF re-iterates the requirement for Local Plans to *'be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies*

set out in this Framework, including the presumption in favour of sustainable development.’ Paragraph 152 expands on this, stating ‘Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.’

- 2.31 COMMENT:** As noted at paragraph 2.10 of this submission, and in our previous statements and submissions to the Council, the full range of options for delivering sustainable growth to meet current and future needs have not been adequately explored through the process of preparing the Core Strategy and as a consequence the plan has failed to take account of genuine opportunities to deliver sustainable growth that meet each of the dimensions of sustainable development.
- 2.32 Paragraph 153 of the NPPF makes provision for a Local Plan *to be reviewed in whole or in part to respond flexibly to changing circumstances.*
- 2.33 COMMENT:** Although it was acknowledged by the Council at the examination hearing sessions that there is a shortfall in housing provision and a need to consider opportunities for further growth, such as at Wool, paragraph 2.15.6 of the Council’s statement does not propose any modifications to address this. Given the significant concerns raised in relation to housing provision and delivery, provision should be made for a review of the plan to identify sufficient sites to meet identified growth needs, in particular at Wool, where the evidence base has identified an opportunity to accommodate further growth without impacting on European protected sites.
- 2.34 Paragraph 156 of the NPPF states that Local planning authorities should set out the strategic priorities for the area in the Local Plan. The strategic policies include the delivery of the homes and jobs needed in the area. Paragraph 157 provides a bullet point list of crucial requirements for local plans, which include:
- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
 - *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*

- *be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*
- *indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*

2.35 COMMENT: As set out in our previous statements and submissions, the Core Strategy has failed to plan positively to meet the development needs of the area. The Core Strategy does not allocate sufficient sites to promote development and flexible use of land, failing to bring forward new land for development which is necessary to meet identified needs or address longer term requirements. Provision should be made to identify sufficient sites to meet identified growth needs, focused on opportunities at Wool which can deliver growth in a sustainable manner without adverse impacts on European protected sites.

2.36 Paragraph 158 requires that *'the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'*

2.37 COMMENT: As set out in our previous statements, the Core Strategy does not reflect the available evidence in the SHMAA in relation to housing need and supply, and does not take full account of relevant market and economic signals, in particular the affordability of housing.

2.38 Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area. This should be based on a SHMA to address full housing needs and demand, and a SHLAA to establish the availability, suitability and viability of land to meet identified needs.

2.39 COMMENT: As highlighted in our statement on Matter 4: Housing, the Core Strategy does not address the high level of housing need identified in the SHMAA, despite the availability of suitable sites as identified in the SHLAA.

Planning strategically across local boundaries

- 2.40 Paragraph 178 sets out a *'duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities'* which include the delivery of the homes and jobs needed in the area. Paragraph 179 explains that *'Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.'*
- 2.41 Paragraph 181 places a requirement on local planning authorities to *'demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.'*
- 2.42 **COMMENT:** There has clearly been a good degree of co-operation between Dorset local authorities on evidence base studies such as the Strategic Housing Market Assessment and its recent update. However, this co-operation does not appear to extend to ensuring that housing provision across the Housing Market Area meets the identified needs, and there is no evidence to demonstrate that the overall development requirements of the HMA will be met. The absence of any objection from neighbouring authorities on this matter should not be taken as evidence on having cooperated effectively to plan for cross-boundary issues.
- 2.43 The suggestion at paragraph 2.17.1 of the Council's statement that there would be an over-provision of housing across the conurbation that could help meet Purbeck's needs is completely unfounded and does not stand up to scrutiny. To date none of the local authorities in the housing market area have adopted or proposed draft plans that are intended to meet housing needs beyond their own boundaries. The SHMA indicates a total annual housing need in the HMA of 8,350. This compares with a total planned provision across the housing market area in emerging and adopted plans of circa 2,070 dwellings per annum, suggesting an annual shortfall of 6,280 dwellings.

3. Conclusion

- 3.1 The Core Strategy has not sufficiently addressed the guidance in the NPPF. It has not been positively prepared, does not represent the most appropriate strategy based on the evidence available, will not be effective in delivering sustainable development, and is not consistent with national policy. As a result the plan is considered unsound.**