



Planning Policy Team
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset
BH20 4PP

SENT BY E-MAIL AND POST

6th November 2015

Dear Sir / Madam

SWANAGE PRE SUBMISSION LOCAL PLAN CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearing Sessions to discuss matters in greater detail.

Plan period

It is noted that if the Swanage Local Plan is adopted in 2016 only 11 years will remain before the end of the plan period (2007 – 2027). The National Planning Policy Framework (NPPF) recommends a 15 year timeframe for Plans (paragraph 157). Whilst other Local Plans have been adopted with a shorter than 15 year timespan these Plans also rely upon an early review mechanism to rectify this deficiency, for example, the Swindon Local Plan. The use of a strategic review at an early stage in the life of a development plan has also been successfully defended in a High Court Judgment in relation to the Dacorum Core Strategy (Neutral Citation Number [2014] EWHC 1894 (Admin)) in which a main modification committed the Council to aim to adopt its reviewed Plan by 2017/18. Paragraph 51 of that judgment refers to the National Planning Practise Guidance (NPPG), which states that: "*Local Plans may be found sound conditional upon a review in whole or in part within*

five years of the date of the adoption.” The Written Ministerial Statement dated 22nd July 2015 also refers to “*a commitment to an early review of a Local Plan may be appropriate as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan’s soundness or legal competence as a whole*”. Therefore it is suggested that an early review policy should be included in the Swanage Local Plan or alternatively the plan period is extended. Any early review should be a Policy commitment rather than just a reference in supporting text. This commitment should ensure that the Council prepares and submits to the Secretary of State for examination the reviewed Plan by a specified date within 5 years of adoption. This specified date should also be co-ordinated to coincide with the current review of the Purbeck Local Plan which is underway. The matter of an appropriate plan period should be given further consideration by the Council.

Housing Needs

When in 2012 the Inspector’s Final Report on the Purbeck Local Plan was published it was the Inspector’s over-riding view that the District could accommodate a higher level of housing growth accompanied by appropriate mitigation measures to meet more fully its housing needs in the medium to long term. The housing requirement in the adopted Purbeck Local Plan is only 120 dwellings per annum. It is understood that the Draft Eastern Dorset SHMA identifies 218 dwellings per annum as the objectively assessed housing need (OAHN) for Purbeck which will support economic growth in the District. Under the NPPF “*to boost significantly the supply of housing local planning 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, as far as is consistent with the policies set out in this Framework*” (paragraph 47). As clearly evident that the latest OAHN is significantly higher than the figure in the adopted Purbeck Local Plan. It is also understood that Swanage is expected to take up a large share of the outstanding 262 new homes for the South East Purbeck requirement. In this context the relationship between the Swanage Local Plan and the Purbeck Local Plan is not obvious. The Council should provide further clarification on this matter in particular whether or not the Swanage Local Plan should be planning for a higher housing requirement.

Housing Land Supply

Policy SS allocates 200 new homes on edge of Swanage on 3 sites identified as Northbrook Road East (90 units plus 52 units already consented), Northbrook Road West (90 units) and Prospect Farm (20 units). Other than these proposed allocations it is assumed that opportunities for windfall sites within the settlement boundary will be a finite resource.

It is also noted that these allocated sites are included in the Council’s 5 Year Housing Land Supply (YHLS) making it critical that these sites are both deliverable and viable. If on adoption of the Local Plan there is not reasonable certainty that the Council has a 5 YHLS the Plan would be unsound because it would be neither effective not consistent with national policy. So if the Plan

is not to be out of date on adoption it is critical that the land supply requirement is achieved otherwise *“relevant policies for the supply of housing will not be considered up to date if the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites”* (paragraph 49 of the NPPF).

If it becomes necessary to allocate additional housing sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

When re-considering housing land supply it would also be prudent for the Council to make provision for safeguarded land to meet the development needs of the area as recommended in the Inspector’s Final Report of the Purbeck Local Plan.

Viability

It is proposed that 50% of houses will be affordable homes with preference for 90% of affordable homes to be affordable rent subject to the awaited outcomes of a Housing Needs Study to be completed at end of 2015. If the Plan is to be compliant with the national policy, the Council must satisfy the requirements of paragraphs 173 and 174 of the NPPF whereby development should not be subject to such a scale of obligations and policy burdens that viability is threatened. So the Council must properly assess viability. The Council’s existing viability study is somewhat dated originating from 2010 which pre-dates the NPPF requirements for whole plan viability assessments. It is recommended that the Council undertakes a refresh of its viability testing before submission of the Swanage Local Plan for examination.

One reason for regularly up dating viability assessments is that the residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant consequential impact on viability. Therefore it is important to understand and test the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that *“what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”*.

Conclusions

For the Swanage Local Plan to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and compliant with national policy. Therefore it is necessary for the Council to re-consider the Swanage Pre Submission Local Plan in respect of the plan period, housing needs, housing land supply and whole plan viability testing as outlined above without doing so it could be concluded that the Local Plan is unsound for failing to be consistent with national policy, positively prepared, properly justified and so ultimately ineffective.

It is hoped that these comments are helpful in informing the next stages of the Swanage Local Plan. If any further assistance or information is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans

e-mail: sue.green@hbf.co.uk
Mobile : 07817 865534