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SENT BY E-MAIL AND POST

13<sup>th</sup> March 2015

Dear Sir / Madam

## **PURBECK LOCAL PLAN PARTIAL REVIEW ISSUES AND OPTIONS 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.

### **Duty to Co-operate**

An on-going dialogue with neighbouring authorities is essential to ensure that any unmet needs from Purbeck are met elsewhere in the Eastern Dorset Housing Market Area (HMA) without which the Local Plan Part 1 Review will be unsound.

### **Plan period**

The Purbeck Local Plan Inspector's Report dated 31<sup>st</sup> October 2012 stated that the plan was only an appropriate basis for the planning of the District in the short term and that a partial review of the plan would be urgently required commencing in 2013 so already timescales have slipped.

If the Review will not be completed until 2017 a proposed plan end date of 2031 is considered too truncated. In Paragraph 157 the NPPF recommends that Local Plans should *“be drawn up over an appropriate time scale, preferably a 15 year time horizon”* therefore the Purbeck Local Plan should have an end date beyond 2031.

It is suggested that the Eastern Dorset Housing Market Area (HMA) authorities should co-ordinate their plan periods accordingly and in doing so commission any necessary evidence based work required. The same comments will be submitted to the Poole Partial Review Issues & Options consultation ending on 31<sup>st</sup> March 2015.

## **Housing**

In 2012 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. 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. This OAHN is significantly higher than the 120 dwellings per annum in the adopted Purbeck Local Plan.

At this time the HBF reserves its right to comment further on the OAHN when the Eastern Dorset SHMA is published. However suffice to say that 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).

When identifying locations for growth and site allocations to meet the District’s OAHN the Council should consider the widest variety of sites by size, location and market type to enable the house building industry to maximise delivery. At this time it would also be prudent for the Council to make provision for safeguarded land to meet the development needs of the area as recommended by the Inspector.

## **Green Belt**

The Inspector’s Report concerning the proposed Partial Review of the Local Plan recommended a review of the Green Belt to specifically identify and amend boundaries accordingly. It is understood that the Council has undertaken an up-dated Green Belt Review. The Ministerial foreword of the NPPF sets out that *“the purpose of planning is to help achieve sustainable development”* in order to achieve such sustainable development the Council is correct in stating that its Green Belt boundaries should be appropriately drawn and land in the Green Belt should perform one of the five purposes of the Green Belt as set out in the NPPF (Paragraph 80).

## **Affordable Housing**

Any revisions to the Affordable Housing Policy must comply with national policy on thresholds as set out in the House of Commons Written Statement on Support for Small Scale Developers, Custom and Self-builders dated 28 November 2015.

## **Self Build**

If the Council wishes to encourage self-build based on evidence that such a need exists this should be done positively to increase the overall amount of new housing development rather than by a restrictive policy requirement for inclusion of such housing on larger development sites. Such a policy approach only changes the form of delivery of allocated / permitted dwellings from a national volume or medium sized regional house building company to a self-builder without any consequential additional contribution to boosting housing supply. If these plots are not developed by self builders then the Council has caused unnecessary delay to the delivery of these houses.

The Council should also give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build programme, etc.) of implementing any such policy and all proposals should be subject to appropriate viability testing.

Self build and / or custom build should be defined in the Glossary of terms included in the Local Plan.

## **Other Existing Policies**

The Council should review other policies in the adopted Local Plan to align with the outcomes of the Housing Standards Review (when known) and other recent consultations such as "*Next Steps to Zero Carbon Homes – Allowable Solutions*", "*Next Steps to Zero Carbon Homes – Small Sites Exemptions*" dated November 2014 and documents such as "*Better Connected – A Practical Guide to Utilities for Home Builders*".

It is hoped that these comments are helpful in informing the next stages of the Purbeck Local Plan Part 1 Partial Review. If any further assistance or information is required please contact the undersigned.

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



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