

Response to Purbeck District Council's Review Options Consultation

WMPC

Preferred Option 2 – Meeting Objectively Assessed Needs

Do you agree with the proposal to meet our objectively assessed needs of around 3,080 additional new homes between 2013 and 2033?

Answer- NO

Comments-

SHMA housing projections are “policy off”. PDC must now apply “policy on” by applying PDC policy and fully considering the effects on the unique geography and environment of Purbeck. The need for this number of houses in Purbeck is not accepted. It does not take into account:-

- Effects of a major economic downturn (e.g following Brexit)
- Reduce housing as people leave to find decent work
- Consider stopping loss of Social/Council housing
- “Housing need” numbers include those currently in private rented accommodation and therefore not in need of a new house. This increases the proposed new house numbers.
- Increased recreation pressure and urbanisation damaging landscape, environment and habitat
- Second homes and holiday homes are included in the new housing numbers-why when there is already enough of this type of housing stock in the Purbecks?
- Loss of habitat, damage to nature conservation
- Adverse effects on the integrity of protected sites, AONB etc
- Unwanted urbanisation effects on communities
- Negative effects of increased population on tourist assets
- Lack of infrastructure – roads, schools, medical centres, sports amenity
- Lack of places to include new infrastructure
- Lack of good quality jobs (particularly acute South of Corfe)
- Increased traffic pollution/congestion caused by commuting out of Purbeck for jobs
- Air quality and dark night sky impacts of houses and traffic
- Loss of farmland on future sustainable food production, particularly given the loss of the European 3 crops option and loss of greenbelt land to green technology, biofuels, oil rigs, quarrying etc.
- The unique traffic congestion difficulties of Purbecks because only two ways in and out of South Purbeck by car – through Corfe and expensive ferry (£4.20 each way for a car)

Alternative Option 1 – Delivering more than the objectively assessed housing need.

Answer – NO

Issue 1 – Impact of Second Homes

Answers-

Positive impacts – Jobs for trades, builders, gardeners and purchasing power. Increased house prices and rents for local people to profit from if locals sell up or rent out their houses.

Negative impacts- Where houses are bought as investments or holiday let businesses there is no local community support or participation due to the transient nature of the business. Second home owners spend money locally but it is less consistent than local spending, making a year around business less viable. Houses occupied only a month a year do not help the local economy and limit housing stock leading to increase in house prices and rents for locals who wish to stay in the community but who can't compete on low wages.

Preferred Option 3 – Development Strategy

Do you agree that the Development Strategy should be infrastructure-led with a focus on sustainable locations, wherever possible?

Answer- This is a poorly worded question and not properly explained in the supporting Options Consultation Document. We are unclear as to how to answer this.

Sustainability has many meanings but in terms of “profitable Purbecks” means not losing farmland, maintaining and enhancing a unique environment that attracts tourism, having a good road system and well paid jobs. None of this is addressed in this consultation.

Do you agree with the Council’s proposals for Sites 1, 2 3,4,5,6,7,8 (Wool to Langton Matravers).

Answer- See Reply to Preferred Option 2 and Preferred Option 3. We consider all sites to be overdevelopment because such numbers are not needed. It will overstretch infrastructure. Don't agree with the SANG policy.

In addition, in respect of **Langton Matravers**, this is not an “allocated site” but should be maintained as a Rural Exception Site.

In respect of **Harmans Cross**, this site should include at least 50% affordable rented housing with a strong preference for social rented housing given the low wage to house price ratio in the Parish. In respect of Harmans Cross infrastructure, footpaths in the village need to be completed for pedestrian safety so that pedestrians do not have to cross the road 3 times to get from one amenity to another.

Alternative Option 2- maximise housing in SW Purbeck -

Answer - No

Alternative Option 2 sites 10,11

Answer – Disagree

Alternative Option 3 – maximising housing in NE Purbeck

Answer – No

Query why no development plots proposed for Bere Regis?

Alternative Option 3: Sites 12, 13

Answer- Disagree

Possible Additional Option – Rounding Off

There has already been a long consultation on this and strongly disagree.

Preferred Option 4 – Employment Land

Answer- Poor question – where are the jobs and type of industry that can be attracted? We need to fill the employment land that Purbeck already has. After that, prefer Dorset Green and Holton Heath, subject to biodiversity constraints.

Preferred Option 6 – Heathland Mitigation

Answer- Need protection of Heathland. Compliance with Biodiversity mitigation.

Preferred Option 7 – Norden Park and Ride

Answer- Not sure if expansion is needed as seems to be underutilised at the moment.

Policy AH – Affordable Housing (CIL)

Do you agree?

Answer-No

Want support for smaller developments.

Policy RES- Rural Exception Sites

Do you agree?

Answer-No

No prior consultation- PDC are legally required to give a reasonable consultation period with supporting evidence. This has not been done and this RES policy must be separately reviewed.

We do not want any market housing on RES. Market housing:-

- encourages second homes and holiday homes in exceptional locations in AONB.
- Gives rise to speculators who will target this valuable AONB land
- Increases land value leading to more unaffordable houses (see problem on land price increase in Church Knowle as a result of market housing option on RES. This site was going to be for affordable housing until the landowner wanted more money because of the prospect of market housing).
- At 30% brings in second homes and holiday homes that damage sustainability as there are already so many. SHMA pg 237 cl 10.175 – houses close to sea or with sea views- “Agents cautioned that unless covenants and planning restrictions...will not be occupied by local households”.

We are in favour of Community led projects such as Community Land Trusts.

SHMA does not refer to market or low cost housing on RES – only equity based products such as shared ownership. Adding in 30% market housing when there is already a policy for low cost

market housing is unsupported by evidence. Low cost housing is market housing for sale as described in the NPPF and so the need for more market housing is unsupported by legislation and unsupported by our community.

Policy AHT – Tenure

Do you agree

Answer-No

SHMA clause 7.31 – “Affordability is more acute at the lower end of the market with this being particularly high in Purbeck”.

SHMA clause 6.72 pg 102 – Purbeck has lower net need for intermediate housing.

SHMA clause 6.73 – Intermediate numbers are based on savings and could be lower.

SHMA figures of 23% sale /76% rent relates to an average covering all of Bournemouth, Christchurch, E Dorset, N Dorset, Poole and Purbeck. It relates to Affordable housing and not specifically to RES. A general average across all these Districts is inappropriate to Purbeck and PDC needs to do a lot more work on this before presenting it for Consultation.

Current policy correctly states “social rented housing is most suited to Purbecks because wages are low and house prices high”. As that is PDC Policy, how has it arrived at only 76% affordable rents? Why has the % of social rents not been specified?

23% intermediate housing includes low cost market housing for sale to those who can secure a mortgage and deposit and have savings. So not affordable to locals in rural villages whose wages are low and often too sporadic to secure a mortgage. Consider also the likelihood of repossessions against those who are overstretched when interest rates rise and where S106 restrictions will be lost to mortgagees, allowing sales of these houses on the open market.

Adding together the proposed market housing and intermediate low cost market housing, it would make circa 50% of a site market sales which makes RES the same as allocated sites. This is unacceptable use of AONB, RES and the wrong application of the NPPF and is unsupported by SHMA.

Current Policy is correct at 10% sale/90% rented. We would prefer a higher percentage of social rented to be specified.

Allocations Policy must be clearly and properly consulted at the same time and in a transparent way alongside the full consultation of affordable housing policy as well as any policies relation to building on RES. It is unacceptable and lacks clarity/transparency to have very short period on consultation on amendments to the allocations policy on the Housing Register without linking it to the RES and AHT Policy. The public needs to know how and to whom houses are allocated. Template S106 agreements should also apply in consultation so that the public is aware of what PDC considers “houses in perpetuity for local people” to really mean.

In terms of calculating affordable price/rents - attaching a discount to market price rents or sale price makes no sense when it is the rural high priced house market to local wage ratio that has disenfranchised local people. Consideration should be given by PDC to a set mark-up on build cost rather than local market rents/price. We will need to see this addressed in the viability evidence in a proper consultation document.

Preferred Option 8 – Self Build

Answer - No

Need more information on the proposal. Where will the land be provided, is it for people in need or just anyone who registers, will it be protected in perpetuity and sold at what discount?

Policy HM – Housing Mix

Answer – No

PDC must listen to and apply individual village needs for housing type (bungalows, semi detached etc) and bedroom numbers for each house. This will save housing from being sold/let out of the community.