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# SHILLINGSTONE NEIGHBOURHOOD PLAN

## Regulation 16 Consultation 20<sup>th</sup> May to 1<sup>st</sup> July 2016

### Response Form

The proposed Shillingstone Neighbourhood Plan has been submitted to North Dorset District Council for examination. The neighbourhood plan and all supporting documentation can be viewed on the District Council's website at: <https://www.dorsetforyou.com/article/422589/North-Dorset-Neighbourhood-Plans---Submitted-Plans>

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

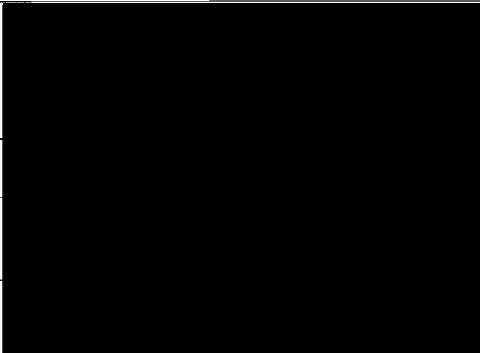
Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

**Deadline: Friday 1<sup>st</sup> July 2016. Representations received after this date will not be accepted.**

### Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

	Personal Details (if applicable)*	Agent's Details (if applicable)*
Title	Mr	
First Name	Graham	
Last Name	Pring	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Tel. No.		
Email Address		

## Part B – Representation

1. To which document does the comment relate? Please tick one box only.

<input checked="" type="checkbox"/>	Neighbourhood Plan Submission Draft
<input type="checkbox"/>	Neighbourhood Area Map (included within the neighbourhood plan document)
<input type="checkbox"/>	Consultation Summary
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report
<input type="checkbox"/>	Strategic Environmental Assessment Statement of Reasons and Requirement for a Habitats Regulations Assessment
<input type="checkbox"/>	Other Please specify:

2. To which part of the document does the comment relate? Please identify the text that you are commenting on, where appropriate. For example, if you are commenting on the landscape paragraph on page 4 of the neighbourhood plan document, either write 'Our Environment/Landscape' against the Section box or '4/Landscape' against the Page box.

	Location of Text
Whole document	
Section	
Policy	
Page	"3 Housing", "17 Locations for new development"
Appendix	

3. Do you wish to? Please tick one box only.

<input type="checkbox"/>	Support
<input type="checkbox"/>	Support with conditions
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation
<input type="checkbox"/>	Other

4. Please use the box below to give reasons for your support/objection or make your observation.

Objection is raised to the proposed allocation in the Shillingstone Neighbourhood Plan (SNP) of only 40 dwellings. P17 of the Draft Submission Plan states: "Our evidence suggests that about 40 new homes over the plan period would be a good amount of development for our area. This would provide a reasonable level of growth similar to what has happened in the past but not too much at any one time." P3 states: "Data on completions provided by the County Council shows that for much of the time, over the past 20 years, the average number of new homes built has been between 2 and 3 homes a year. There was a particular spike in housing between 2005 and 2008 when the Augustan Avenue estate/Hambledon View developments were built, providing nearly 60 homes in a very short time." The evidence base for the above is "Housing Needs Assessment Shillingstone (July 2015), hereafter SHNA" under Supporting Evidence for the SNP and I now refer in detail to this document.

### 5.1. Local Plan Target.

The now adopted NDDC Local Plan Part 1 states that **at least** 825 homes are required in the period 2011 to 2031. Para 5.26 further states: "The figure of at least 825 new homes should not be seen as a target for, or a cap on, the overall level of housing development that should take place in Stalbridge the 18 villages and the countryside." The calculations used in the SHNA give an estimated housing need for Shillingstone, based on the Local Plan Target, of 43 dwellings. However, it then states: "It should be noted this is a high level figure. It does not factor in any local considerations specific to

Shillingstone. In my opinion, it is a low level figure as it is purely based on population and does not take into account facilities, services, proximity to services etc specific to Shillingstone. The SHNA then discusses what it considers to be the following more specific elements in tailoring its assessment.

## 5.2 Past Build Rates.

The SHNA acknowledges that the average annual housing completion figure for Shillingstone (1994/2014) is **4.9** dwellings per annum, which by my calculations would equate to **73.5** dwellings between 2016 and 2031. However it states this includes what it terms as a 'spike' in development of 58 dwellings completed between 2005 and 2008, which it considers should be excluded in estimating housing need as it is a 'one off' and does not represent typical deliver rates. It gives the average without the 'spike' as being **2.4** dwellings per annum which by my calculations equates to 36 dwellings between 2016 and 2031.

I have carried out my own research in relation to this, consulting the extensive statistical/census figures on the Dorset for You website and have liaised directly with the Office for National Statistics for confirmation. I present as evidence the following figures relating to population and number of households in Shillingstone over a more extensive period between 1981 and 2011:

	1981	1991	2001	2011
Population:	760	930	1010	1170
No of Households:	311 – 317	388	429	479

The only figure I have been unable to confirm, as the data does not appear to be available, is the number of households for 1981. I have therefore provided a range which is based at the lower end of the scale on the number of persons per household of 2.442 as per the 2011 census and at the upper end of the scale 2.397 for the 1991 census. This gives the following:

Increase of 74 (taking a mid-point of 314) households between 1981 and 1991 ie **7.4** per annum  
 Increase of 41 households between 1991 and 2001 ie **4.1** per annum  
 Increase of 50 households between 2001 and 2011 ie **5** per annum  
 Increase of 115 households between 1981 and 2001 ie **5.75** per annum  
 Increase of 91 households between 1991 and 2011 ie **4.55** per annum

Overall, an increase of 165 households between 1981 and 2011 ie **5.5** per annum. If this figure was applied for the SNP period 2016 to 2031, this would equate to **82.5** dwellings. In my respectful submission, the 'spike' as it is termed, based on my findings, is not a 'one off' and should not be excluded; rather this 'spike' was needed to boost the low levels of completions in this period. I am aware that the recession/economic downturn was a factor between 1994 and 2014; certainly both our Post Office/Store and Countrywise Store ceased trading during this period.

## 5.4 Housing Register

The SHNA states that there are 22 applicants interested in Shillingstone on the housing register. Currently NDDC generally specify that 40% of new builds should be affordable housing; thus in order to arrive at 22 affordable dwellings, there would have to be 55 new dwellings. In my view this figure of 55 should be included in the Average Housing Needs calculations at **5.5** in the SHNA.

## Neighbourhood Plan Questionnaire Responses.

This questionnaire is Appendix 4 in the submitted document Shillingstone Neighbourhood Plan Consultation Summary. On P3 of the Summary, under 'How we consulted', it states: "The first in depth consultation took place in Summer 2014 when a questionnaire was delivered to every home in the village." Under 'Representations received' it states: "More than 250 were returned". In my opinion, this is very misleading, as it gives the impression that more than 250 responses were received from a total of 479 being the number of homes in Shillingstone, which would give a very high response rate in the region of 52%. This is not the case as, in fact, approximately 963 questionnaires were delivered to all eligible to vote. I say approximately as this is based on the Minutes of the Shillingstone Parish

Council Neighbourhood Plan Committee Meeting of 3 November 2014 which states: "255 completed questionnaires had been received, a response rate of 26.5%."

The SHNA states: "A key consideration in the assessment of local housing need is the analysis of the ... Questionnaire. The key findings of this questionnaire related to housing need were as follows:

46 (19.25%) felt less than 10 new houses required

113 (47.3%) felt 11 to 25 houses required

65 (27.2%) felt 26 to 50 houses required

15 (6.3%) felt more than 50 houses required"

If however the above figures are expressed as a % of the 963 total number of questionnaires, then 46 equates to 4.8%, 113 equates to 11.7%, 65 equates to 6.8% and 15 equates to 1.6%.

The percentages based on the total number of questionnaires evidence that the questionnaire is not in my opinion a key consideration in the assessment of housing need for Shillingstone. The questionnaire is also in my opinion, narrow, subjective and is more reflective of the common, and to some considerable degree, natural response to new development as evidenced by the word "felt" in the SHNAA figures. I would also suggest that it is not proportionate as per NPPG Para: 014 Ref ID: 2a-014-20140306. In the circumstances, I consider that the questionnaire should be excluded from the housing need calculations.

### 5.5 Average Housing Needs Figure

I put forward the following figures based on the above.

Source of housing need information	Annual requirement	Housing need 2016/2031
Draft Local Plan Target	2.5 homes a year	43
Past Build Rates	5.5 homes a year	82
Housing Register	3.7 homes a year	55 (To obtain 22 affordable housing)
<b>Average(mean)</b>	<b>3.9 homes a year</b>	<b>60</b>

I do not profess to be a housing professional but I do consider that my research / calculations / evidence, gives at the very least an indication that the housing needs figure should be higher than 40. In fact this figure of 40 is less than 43 which is the calculation in the SHNA arrived at from the housing need figure in the adopted NDDC Local Plan Part 1. Para 184 of the NPPF makes it clear that Neighbourhood Plans should not promote less development than set out in the Local Plan.

When the NDDC Local Plan Part 1 was originally submitted for examination, it indicated a minimum of 230 homes would be provided in the countryside between 2011 and 2026. The Inspector considered this to be a residual amount required to deliver the overall district provision of 4200 homes by 2026 after growth was taken into account in the four main towns. It did not reflect a measured need for housing in rural areas which could help to promote a strong rural economy as sought by Para28 of the NPPF. Following this NDDC commissioned further work which identified that 5700 homes were required district wide from 2011 to 2031, equating to 285 dwellings per annum throughout the district. This translates to 41 dwellings per annum (approximately 14%) / 826 dwellings in the countryside from 2011 to 2031. I give this background as it illustrates the high level of growth identified/required. By way of contrast the SNP is proposing to keep growth stagnant at a perceived level of between 2 and 3 homes a year excluding the 'spike' of course. When the NDDC Local Plan was adopted it also specified **at least 825 dwellings** were to be provided.

I understand that the Eastern Dorset SHMA 2015 has concluded that a revised objectively assessed need for North Dorset is 330 dwellings per annum as opposed to the current figure of 285 on which the current housing policies in NDDC Local Plan Part 1 are based, an increase of approximately 16%. This would give a revised figure for Stalbridge and the 18 villages in the region of 958 dwellings between 2011 and 2031. NDDC Local Plan Part 1, despite only being adopted in January 2016 is

currently being reviewed.

NDDC have not specified a housing target for Stalbridge and the 18 sustainable villages in NDDC Local Plan Part 1 hoping that Neighbourhood Plans would identify the local housing need. However less than half of the villages have been designated (currently 7) with 2 further applications in the pipeline. I understand NDDC Local Plan Part 2 will be prescribing housing targets.

On a general note, I am surprised that Paras 5.25 and 5.26 of the NDDC Local Plan Part 1 in relation to the 825 dwellings required are not included in their entirety in the submitted SNP. Shillingstone is one of the 18 most sustainable villages and any objectively assessed housing need for Shillingstone will impact upon the other villages and vice versa. In my opinion these Paras should have been included from the beginning of the consultation process to set the context and people would then have had the opportunity to comment on this. I consider that these paras should be included with a consultation period to follow before proceeding to any referendum.

In view of my comments in relation to the Neighbourhood Plan Questionnaire, I strongly disagree with the statement on P2 of the submitted SNP under Who wrote the Neighbourhood Plan: "This document reflects the consensus of all local residents" as it clearly does not. I would suggest either deleting it or amending it to: "This document reflects the consensus of a minority of local residents."

To conclude, in my opinion the submitted Shillingstone Neighbourhood Plan is not underpinned by robust, objectively assessed data on local housing need and further analysis is required; in particular data from the Eastern Dorset SHMA 2015. In the circumstances, it may be considered prudent to await the review of NDDC Local Plan Part 1 / NDDC Local Plan Part 2 before proceeding further?

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**5. Please give details of any suggested modifications in the box below.**

*Continue overleaf if necessary*

**6. Do you wish to be notified of the District Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.**

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature:  \_\_\_\_\_

Date: 30 June 2016.

*If submitting the form electronically, no signature is required.*

*Please use this box to continue your responses to Questions 4 & 5 if necessary*