

Gladman Developments Ltd

**Representations on
North Dorset Local Plan Part 1
Mid Hearing Documents Consultation**



May 2015

1 INTRODUCTION

1.1 Overview

- 1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments’ representations on the Mid Hearing Documents prepared for the North Dorset Local Plan Examination. This follows our recent participation in the Local Plan Examination hearing sessions **and our previous submissions on the Council’s Pre-Submission and Local Plan Focussed Changes consultations.**
- 1.1.2 Through our previous submissions on the Local Plan Gladman have questioned the **adequacy of the Council’s housing requirement** and proposals for bringing forward **development in the district’s rural settlements. We queried whether the authority’s target to provide 280 dwellings per annum was founded on a robust evidence base and was sufficiently aspirational, suggesting that further housing needed to be provided to cover at least a 15-year plan period. As submitted the Council’s strategy for Stalbridge and the villages was overly restrictive and unlikely to be effective in delivering further development.**
- 1.1.3 Whilst Gladman are therefore concerned to see that the Council are continuing to progress their Local Plan on the basis of their submitted housing requirement, we welcome the decision to now extend the Local Plan period to 2031 and recognise that it would be pragmatic to undertake an early Plan review. In light of our previous representations on **the Local Plan’s approach to development in the district’s countryside villages**, we support the general principle of proposing a more permissive strategy towards development in these locations.
- 1.1.4 As submitted through our representations on the Local Plan Focussed Changes and Examination Hearing Statements, Gladman have an interest in land to the south east of **Blandford St Mary, north of Ward’s Drove**. In this regard we welcome the recognition that this site now represents a suitable location for residential development as part of delivering a higher level of housing in this location. We submit that there are no significant constraints that would preclude development from coming forward in this location.
- 1.1.5 The remainder of this representation is structured to respond to specific proposals **contained in the Council’s Mid Hearing Documents.**

2 MHD006 – EXTENDING THE PLAN PERIOD, EARLY REVIEW AND RELATIONSHIP BETWEEN LOCAL PLAN PARTS 1 AND 2

2.1 Overview

2.1.1 Mid Hearing Document MHD006 sets out the Council's proposals for extending the Local Plan period and the need for an early Plan review. At the request of the Local Plan Inspector, provision is now planned for 5,700 homes from 2011 to 2031, with a requirement for a further 1,439 dwellings of supply. In response to questions over the adequacy of the Council's existing housing requirement and the role of the emerging Eastern Dorset SHMA, it is now intended to retain the authority's proposed housing target of 285 dpa, and to commit to an early review of Local Plan Part 1.

2.2 Housing Provision to 2031

2.2.1 In light of our previous submissions, Gladman welcome the proposal to extend the coverage of the Local Plan from 2026 to 2031 and to plan for a total revised housing requirement of 5,700 dwellings over the Plan period. Helping to ensure consistency with the minimum Framework requirement for Local Plans to cover at least a 15-year time horizon post-adoption, we support the recognition that there is now a need to identify an additional supply of 1,425 dwellings, taking account of a second homes allowance, over this extended period.

2.2.2 Mid Hearing Document MHD006 provides further details on the sources of supply that have been identified in order to meet the Council's modified housing requirement. Taking account of completions to date, extant permissions, potential allocations and windfall sites, MHD006 describes how there will be a shortfall of 350 dwellings against the increased identified requirement to provide 5,700 homes up to 2031. It sets out how this supply deficiencies can be met and exceeded through adjustments to the assumed capacity of certain broad locations for growth and through further development in the authority's rural areas.

2.2.3 In light of the requirement to ensure a sufficient supply of homes to meet Local Plan's extended housing target, Gladman welcome the recognition that there is the ability to expand the capacity of the Broad Location for Growth to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a site area that would now include land to the north of Ward's Drove, we support the acknowledgement that this location could now support the delivery of 450 homes, reflective of the area's full development potential.

- 2.2.4 As submitted through our previous representations on the Council's Local Plan Focused Changes and Examination hearing statements, Gladman submit that there are no significant constraints, infrastructure, land ownership or viability issues that would preclude further development coming forward on land to the south east of Blandford St Mary, north of **Ward's Drove within the plan period**. This site could be successfully developed to provide a proposal that is well related to its surroundings and the existing form of the settlement. Increasing the level of housing directed to this location, consistent with a boundary that extends to Ward's Drove, would provide a logical and defensible boundary to development.



Figure 1 Land South East of Blandford St Mary, North of Ward's Drove

- 2.2.5 Land to south east of Blandford St Mary, **north of Ward's Drove is considered to be** deliverable as it is available now, offers a suitable location for development and is achievable. Gladman and the landowner are committed to delivering a high quality scheme in this location and would welcome further discussions with the Council regarding this.
- 2.2.6 At the recent Local Plan Examination hearings a number of participants raised concerns as to the timescales for adopting Local Plan Part 1 and the subsequent preparation of a Part 2 allocations document. They queried the effects this two stage approach would have on bringing development forward, with allocations for the majority of the **Local Plan's** broad locations deferred to this second stage of the Plan making process. In this context Gladman welcome the clarification provided in paragraph 6.5 of MHD006 which sets out the **authority's position on the definition of settlement boundaries alongside the Local Plan's**

housing proposals, enabling development to be brought forward on these sites ahead of Local Plan Part 2.

- 2.2.7 **MHD006 summarises the other components of supply that will meet the Council’s revised** housing requirement of 5,700 for the period 2011-2031. In this regard the Council must be satisfied that it can demonstrate a sufficient and robust supply of deliverable and **developable land to meet the area’s housing needs, taking account of any shortfalls that** may arise through sites failing to come forward as anticipated or delivering the level of homes originally planned. It should be recognised that in some instances achieving a deliverable supply of housing land may be best achieved through sites that do not benefit from a formal plan allocation.

2.3 The Need for an Early Review of Local Plan Part 1

- 2.3.1 Through our previous representations on the Local Plan Gladman questioned the adequacy of the **Council’s proposed** housing target and whether this is based on a robust assessment **of the authority’s housing needs**. We queried whether the target to provide 280 dpa was consistent with the Framework requirement to significantly boost the supply of housing in **light of the authority’s past delivery performance**, and took account of the full range of factors that must be considered when objectively assessing housing needs.

- 2.3.2 In light of our past submissions Gladman would therefore be concerned by the decision to advance the Local Plan based on a housing requirement that may not be sufficiently aspirational and founded on a deficient evidence base. As set out in our Matter 4 Hearing **Statement and supported by an independent critique of the authority’s housing needs by** consultants GVA, it is clear that further work must be undertaken to understand what the **Council’s objectively assessed needs would be**. Gladman would question the ability to adopt a housing requirement that without further explanation and justification could not be considered sound.

- 2.3.3 **Whilst maintaining our previous objections to the Council’s housing target, Gladman** recognise that it would be pragmatic to undertake an early review of the Local Plan to consider the findings of the emerging Eastern Dorset SHMA and to consider its implications for delivering housing with other local authorities across the wider housing market area. Noting the scenarios that would establish the extent of any review, we submit that the commitment to undertake an early Plan review should be made explicit in the Local Plan, and transposed into an effective policy obligation.

- 2.3.4 **Noting the comparison of the Council’s proposed** housing requirement to household projections, Gladman remind the Council that the preparation of the Eastern Dorset SHMA

should be undertaken with full regard to requirements of the Framework and Planning Practice Guidance on Housing and Economic Development Needs Assessments. Assessing the need for housing taking account of household and economic projections, the SHMA should consider whether the level of housing should be increased to address market signals of housing supply and demand and meet the **authority's affordable needs in full**. Gladman remind the Council that the process of identifying and meeting objectively assessed needs should be undertaken with full regard to the Duty to Cooperate.

2.4 Conclusions

- 2.4.1 Gladman welcome the decision to extend the Local Plan period by a further five years and Plan for an additional 1,437 homes up to 2031. As part of accommodating an increased level of housing, we particularly welcome the decision to direct a higher level of growth to the south east of **Blandford St Mary Broad Location for Growth (the St Mary's Hill Site)**, recognising the potential to bring forward further housing on land to the north of Ward's Drive.
- 2.4.2 Gladman remain concerned that the Local Plan is continuing to progress a housing requirement that is not founded on a robust evidence and may not be sufficiently **aspirational to meet the district's needs**. Whilst maintaining this position, we recognise that it would be pragmatic for the authority to undertake an early Plan review to consider the findings of the emerging Eastern Dorset SHMA and to align Plan preparation across the wider housing market area. This commitment should be made explicit in the Local Plan.

3 MHD007 – REAPPRAISING THE COUNCIL'S APPROACH TO DEVELOPMENT IN THE COUNTRYSIDE TO PROMOTE A STRONG RURAL ECONOMY

3.1 Overview

- 3.1.1 Mid Hearing Document MHD007 sets out the Council's proposals for amending the Local Plan's approach to development in Stalbridge and North Dorset's villages. Reflecting the concerns of the Local Plan Inspector over the previous restrictive approach to development **in the authority's countryside villages**, the Council is now proposing to advance a more permissive strategy towards growth in these locations, reinstating the identification of Stalbridge and the 18 More Sustainable Villages (MSV) for the purposes of guiding development and the use of settlement boundaries. This has been supplemented by further work to understand the specific housing needs of the district's rural areas.

3.2 Housing Need in Rural Areas

- 3.2.1 As submitted Gladman considered the Local Plan's strategy to further development in Stalbridge and the villages was neither justified nor effective. Seeking to provide a minimum of just 230 dwellings in these locations over the Plan period, we submitted that the **Local Plan's approach failed to take account of role and ability of individual settlements** to accommodate further sustainable development and created uncertainty as to whether their housing needs would be met. **The authority's unjustified policy of restraint** was inconsistent with the requirements of the Framework and Rural Housing PPG.
- 3.2.2 In light of our previous submissions and the concerns raised by the Inspector at the recent Local Plan Examination Hearings, Gladman now welcome the proposal to advance a more permissive policy approach to development in Stalbridge and the villages. Based on the Option 3A **proposal outlined in the authority's March 2012 Moving Forward with the Spatial Strategy Panel Report** rather than a full re-appraisal on the Council's approach, MHD007 **describes how the Council's revised framework for further development in these settlements** is intended to retain the principle maximum choice for local communities whilst providing guidance on those locations that are considered to be more sustainable in terms of their size and the level of services they provide.
- 3.2.3 Whilst supporting the general principle of allowing for further development in the authority's rural areas, Gladman continue to be **concerned that the Council's revised strategy for** Stalbridge and the villages lacks clarity and may continue to deliver insufficient housing in its current form. Although the Council is now proposing to highlight those settlements that are considered to be more or less sustainable for the purposes of guiding development, there is no reference to the level of growth that each of these locations could deliver or how this will be secured through the Neighbourhood Plan or allocation processes. The Council should ensure that each of the **district's settlements have the opportunity to support further** sustainable development through an effective policy framework.
- 3.2.4 **The Council's revised** proposal to provide a total of 826 dwellings in North Dorset's rural areas would result in the delivery of 177 further homes through allocations and Neighbourhood Plans across Stalbridge and the 18 MSVs. Lower than the identified need to provide 88 affordable dwellings per annum in the district's rural areas, this requirement is derived from an assessment of future housing needs based on projections of net and zero migration. Gladman note that there is a lack of consistency in the Council's approach to deriving housing targets at the authority-wide and rural-specific levels. To provide the opportunity for further sustainable development in each of the district's settlements the **Council's proposed** housing target for Stalbridge and the villages should be expressed as a minimum.

- 3.2.5 The **Council's revised proposals for the district's rural area includes the reinstatement of** settlement policy boundaries for Stalbridge and the 18 MSVs, providing the opportunity for infill development in these locations. Whilst welcoming the more positive approach to development that this amendment provides, Gladman note that it is the intention to retain a policy of restraint **in the authority's Local Service Villages. In this regard Gladman remind** the Council of the guidance set out in paragraph 001 of the Rural Housing PPG, which makes clear that all settlements can play a role in delivering sustainable development in rural areas. Gladman would be opposed to the use of settlement policy boundaries if these would only serve to restrict otherwise sustainable development from going ahead.

3.3 Conclusions

- 3.3.1 Gladman welcome the Council's decision to progress a more permissive approach to development **in the district's** rural settlements, however we remain concerned that the **authority's revised strategy for Stalbridge and the villages lacks clarity and** may continue to deliver insufficient housing in these locations. The Council should ensure that each of the **authority's settlements has the ability to deliver the sustainable development they can and** should accommodate through an effective policy framework. The Council should recognise that each of authority's settlements, whether large or small, will have development needs that should be met.
- 3.3.2 Whilst recognising the work undertaken to identify the specific housing needs of the **district's rural areas, Gladman note that there is a lack of consistency between this evidence and the basis for setting the Council's overall housing target. The** level of housing that this work suggests is required in the authority's rural areas would result in an average of just 9 additional dwellings being delivered in Stalbridge and each of the 18 MSVs through allocations and Neighbourhood Plans, and is lower than the 88 annual homes that would need to be provided to meet the **rural area's** affordable needs. To provide sufficient scope for further development, we submit that the level of housing sought in these locations should be expressed as a minimum.
- 3.3.3 Gladman hope that you have found these representations to be constrictive. Should you wish to discuss our representations further with a member of the Gladman team please do not hesitate to contact us.