

For office use only	
Batch number: _____	Received: <u>17/9/15</u>
Representor ID # <u>749</u>	Ack: <u>24/9/15</u>
Representation # <u>6102, 6103, 6104</u>	



North Dorset Local Plan Part 1

Main Modifications Consultation

24 July to 18 September 2015

Town and Country Planning (Local Planning) (England) Regulations 2012

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan as amended by Main Modifications. The Inspector produced a note on his preliminary findings into the North Dorset Local Plan Part 1 and this was published on 9 June 2015. The Inspector and the Council wish to be informed about any representations on the proposed main modifications to the Local Plan. Details of the Main Modification documents are available on the Council's web page below:

www.dorsetforyou.com/northdorsetlocalplanmainmod

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

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

Deadline: Midnight on 18 September 2015. Representations received after this time may 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**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. 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 web site, although they will be shown on paper copies that will be sent to the Inspector 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		Sean	
Last Name		Lewis	
Job Title (where relevant)		Planning Assistant	
Organisation (where relevant)	SW HARP	Tetlow King Planning	
Address			
Postcode			
Tel. No.			
Email Address			

Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document)

Please see attached letter

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed main modification?

It has not been positively prepared

It is not justified

It is not effective

It is not consistent with national policy

It does not comply with the law

4. What would you like to happen?

Delete the proposed modification

Amend the proposed modification – you should suggest amended wording below

Add a new policy or paragraph – you should suggest new wording below

(Please give further details or suggested wording in box 6)

5. If there is an additional Examination Hearing Session, would you like to participate?

No, I do not wish to participate

Yes, I would like to participate

6. Your Comments

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

Please see attached letter

Continue on a separate sheet if necessary

Signature: _____

Date: 16/09/15

If submitting the form electronically, no signature is required.

This button should attach your form to a pre-addressed email, if it does not, please save the form and send it to planningpolicy@north-dorset.gov.uk

Click to Submit



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

Date: 17 September 2015

Our Ref: SL M5/0108-08

Your Ref:

By email only:
planningpolicy@north-dorset.gov.uk

Dear Sir or Madam

RE: NORTH DORSET LOCAL PLAN MAIN MODIFICATIONS

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HARPs are well placed to contribute to local plan objectives and act as long term partners in the community.

MM2

We support the Council's commitment to review the Plan following adoption, however, the wording committing to a plan review "*shortly after it is formally adopted*" is not firm enough. It would be useful for the Council to specify an approximate period of time within which it will undertake a review, preferably set out in an updated LDS.

MM5

Overall Housing Requirement

The Plan's overall commitment to deliver 5,700 new dwellings up to 2031 should be increased. The Plan's commitment to make provision for 285 dwellings per annum, and 5,700 homes across the district up to 2031 is significantly lower than the evidence of need. Paragraph 47 of the National Planning Policy Framework (NPPF) calls upon local planning authorities to "*boost significantly the supply of housing*". Appendix 4 of the *Bournemouth / Poole Housing Market Area 2011 Strategic Housing Market Assessment Update – Final Report* (published January 2012) outlines that the North Dorset District's total net annual need up to 2031 is 387 dwellings, which would amount to an overall provision of 7,740 new dwellings across the district up to 2031. This is significantly lower than the plan's existing housing commitment. In accordance with Paragraph 47 of the National Planning Policy Framework, we believe that the Plan's overall commitment to deliver 5,700 new dwellings should be increased.

Affordable Housing Provision

The modifications to Policy 6 include a reduction to the overall provision of affordable housing over the plan period. The Plan now seeks to deliver 1,350 additional affordable homes at the District's four main towns up to 2031. Considering that there has been an extension to the plan period by five years, it is greatly concerning to see a reduction in the overall affordable housing figure.

additional affordable housing. In reality, the private rented sector will continue to house many people in this group due to the shortage of social rented housing.” (Paragraph 8.1)

Whilst this practice will continue, the above High Court decision and Inspector's findings clearly demonstrate the need for the Council to urgently reassess its proposed figures for both market and affordable housing to meet the NPPF and PPG requirements for producing and implementing a Local Plan. An objective assessment of housing needs should be a policy-off assessment of housing need, which is then translated into an appropriate housing target. The Council's current approach represents a clear failure to positively prepare the Plan which, as discussed above, should seek to *“boost significantly the supply of housing”*.

MM8

The High Court judgement in *West Berkshire DC & Reading BC*³ has meant that Paragraphs 012-023 of the online Planning Practice Guidance have now been removed with immediate effect. This means that the *“10-unit Threshold”* – in which developer contributions for affordable housing were not sought for developments of 10 units or less (Paragraph 12, Reference ID: 23B-012-20150326) – has now been removed from national planning guidance. The threshold was initially introduced by the Coalition Government to encourage smaller house builders build more homes and make a higher profit. However, this was detrimental to the future delivery of affordable housing, and impacted upon Housing Associations and Registered Providers to build more affordable homes.

The timing of this High Court decision is unfortunate for North Dorset District Council and Local Planning Authorities who are currently preparing their Development Plans. In the case of North Dorset, MM8 was introduced to update the Local Plan with the new Affordable Housing Threshold. Now this has been removed, the Council may want to reconsider its stance towards Policy 8: Affordable Housing.

Following a telephone call with a planning policy officer at North Dorset District Council, it was indicated that the Planning Policy Panel Committee have decided to retain the 10-unit Threshold – in line with the Government's changes to the Planning Practice Guidance in March 2015 – until a review of the Local Plan will be undertaken, after adoption of the Local Plan. We are concerned to see that the Council will be retaining this threshold for affordable housing.

We urge the Council to return to the former Policy 8 as it was originally published when the Plan was submitted for examination, subject to this being appropriately viability tested. Pre-submission Policy 8 stated: *“All development that delivers three or more net additional dwellings, including housing on mixed-use sites, will contribute to the provision of affordable housing.”*

It is clear that the pre-submission version of Policy 8 will make provision for more housing than a policy which responds to changes to the Planning Practice Guidance. As a result, we strongly recommend that this be amended to its original position.

The above High Court judgement also revoked the *‘Vacant Building Credit’* which sought to remove contributions for affordable housing for buildings or properties that were vacant over a specific period of time. Therefore, we recommend the additional text in Paragraph 5.110 also be removed.

³ *West Berkshire District Council and Reading Borough Council v Department for Communities and Local Government (CO/76/2015, July 2015)*