



Boyer
PLANNING

Christchurch and East Dorset Councils
Core Strategy-Local Plan
Examination in Public

MATTERS AND ISSUES 1: OVERALL STRATEGY

Prepared by Boyer Planning on behalf of Linden Homes Strategic Land
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1. INTRODUCTION

- 1.1 This statement has been prepared by Boyer Planning Limited on behalf of our clients, Linden Homes Strategic Land, in relation to Matters and Issues 1: Overall Strategy of the Christchurch and East Dorset Joint Core Strategy Examination. Linden Homes control land north of Ringwood Road, Verwood which was proposed for allocation under Policy VTSW5 of the Pre-Submission Core Strategy.
- 1.2 This statement specifically addressed the questions that have been raised that are relevant in the context of our representations along with applying these to the tests of soundness set out in the National Planning Policy Framework (NPPF).
- 1.3 In respect of the tests of soundness, we consider that, the Core Strategy as currently drafted is unsound in that it is not justified or effective. Our recommended changes are set out in Section Three of this statement.
- 1.4 We set out our response to the questions posed by the Inspector in Section Two of this statement. Our comments have regard to national planning policy guidance and other material considerations.

2. MATTERS TO BE EXAMINED

4. Is the proposed quantum of housing development (KS3) justified by the evidence? Does it:

- Take account of unmet housing need in adjacent districts?
- Take account of up to date population data?
- Allow for inward migration?
- Take account of economic/employment growth?

Housing Need

- 2.1 In the Core Strategy Pre-Submission April 2012, Policies KS3 and KS4 set a housing target of 3,020 and 5,250 dwellings, between the years 2013 and 2028, in Christchurch and East Dorset respectively. This totalled 8,270 dwellings for the two authorities.
- 2.2 However, in the Core Strategy Proposed Changes document (November 2012), Policies KS3 and KS4 were combined to produce a single housing target of 8,200 homes across the two authorities, with 3,400 of these coming from new neighbourhoods. Advice from the Planning Inspectorate recommended that one housing target should be set for the whole plan area. However, in the process there has been a decrease in the overall housing target of 70 units when compared with the Pre-Submission version, and a decrease of 80 units in the total number of units to be provided by new neighbourhoods. This decrease in provision was due, at least in part, to the deletion of allocation VTSW5 at Verwood.
- 2.3 The Council's current position is that the level of need, informed by the Bournemouth, Dorset and Poole household projections and the SHMA, is 7,500 dwellings but that 8,200 dwellings are proposed within the Joint Core Strategy to provide an approximate 10% flexibility above the level of need.
- 2.4 The Councils state that the need for 7,500 dwellings is based on the Bournemouth and Poole Strategic Housing Market Assessment as modified by Dorset County Council following their input on population and household projections based on the 2011 Census (Bournemouth / Poole Housing Market Area -2011 SHMA update, Final Report January 2012 by JG Consulting in association with Chris Broughton Associates (the 2012 SHMA update)).
- 2.5 The SHMA update covers the six authority areas of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck. Figure 7.6 of the SHMA identifies an annual need of 219 dwellings in Christchurch (a total of 3,285 over the 15 year plan period) and 336 dwellings in East Dorset (a total of 5,040 over the 15 year plan period). This would make a total of 8,325 dwellings across the two authorities over the plan period. The level of need stated by the authorities is therefore 825 dwellings less than stated in the specific document which the Councils have purported to have based their housing need on.

- 2.6 Since the 2012 SHMA update was published in January 2012, two further updates in relation to the housing needs of the authorities have been published.
- 2.7 First, in August 2012, the 2011 Census Based Projections for East Dorset and Christchurch were published in two reports dealing with each authority separately.
- 2.8 The report for East Dorset entitled “East Dorset District 2011 Census Based Projection” indicates household growth of 5,300 dwellings over the period 2011 to 2031. The report for Christchurch entitled “Christchurch Borough 2011 Census Based Projection” indicates household growth of 4,300 dwellings over the period 2011 to 2031. Averaging the annual requirement across the 15 year plan period rather than the 20 years of the projection, leads to a need for 7,200 dwellings over the plan period for the combined authorities. This is therefore 300 dwellings below the level of need stated in the Core Strategy.
- 2.9 In response to the Inspector’s query as to whether the 2011 census data in the SHMA update required updating to take account of census results in April 2013 the Councils have prepared an update paper (August 2013). The table below summarises the Councils’ assessment of the impact of the newly published 2011 Census based Office of National Statistics household projections. As the latest household projections cover a shorter period than previously published data, the Councils have projected the figures forward by averaging the known annual household growth figures and applying this across 15 years.

| | Total Change | Average Per Year | 15 Year Projection |
|---------------------|--------------|------------------|--------------------|
| Christchurch | 2,242 | 224 | 3,363 |
| East Dorset | 2,919 | 292 | 4,379 |
| TOTAL | 5,161 | 516 | 7,742 |

- 2.10 The predicted increase of 7,742 households is 242 dwellings higher than the need referred to in the Core Strategy consolidated version and this represents the most up-to-date assessment of need. In addition, as the update paper considers the growth of households rather than dwellings, there is also a need to allow a vacancy rate and an allowance for second homes. Typically a second home allowance of 1.1% is applied and a vacancy rate of 3%, although further consideration is given to this matter in relation to Question Five below.
- 2.11 It is important to note that the 2011 household projections only cover the period to 2021 and project forward what has happened since 2008, during the recession. The 2011 projections do not therefore necessarily give a clear prediction of household growth post-recession and should be treated as a minimum level.
- 2.12 The evidence base therefore provides three possible scenarios for the Councils’ housing need: 8,325 dwellings; 7,200 dwellings or 7,742 dwellings. It is considered that the figure of 7,742 dwellings provides the most up-to-date estimate of housing need at this time and is likely to be a conservative estimate. As such it is considered that the level of housing need referred to in the Core Strategy should be amended to 7,742 dwellings as a minimum estimate to reflect the evidence base and be considered sound.

10% flexibility

- 2.13 The 2012 SHMA Update states:

“consideration was also given to developing projections related to economic growth, this was however not pursued as part of the SHMA given the current uncertainty on the state of the economy which made it difficult to agree realistic assumptions.”

- 2.14 Given the lack of testing of economic growth scenarios, the inclusion of a minimum of a 10% flexibility allowance is therefore of increased importance. Paragraph 14 of the National Planning Policy Framework (NPPF) establishes the presumption in favour of sustainable development and in relation to plan-making this means *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.”* The inclusion of the 10% flexibility buffer is therefore in accordance with National Policy and in particular the presumption in favour of sustainable development.
- 2.15 As such it is considered that the Councils should retain the principle of the 10% contingency and more accurately reflect this in the Core Strategy. As such the proposed housing target should be increased to 8,516 dwellings over the plan period which provides a 10% allowance over the identified need of 7,742 (but note the inclusion of a vacancy allowance would increase this further (see para 2.25 below)). The 10% contingency should be treated as a minimum to ensure the Core Strategy is sufficiently flexible to respond to changing circumstances during the plan period, particularly given the indications of the latest household growth projections.

Cross Boundary Issues

- 2.16 Having considered cross boundary issues, it is important to note that Bournemouth has adopted an annual average housing requirement of 730 homes (compared to 805 dwellings in the draft South West Regional Spatial Strategy) and Purbeck is proposing to provide for only 92 dwellings per year (compared to 238 expected in the draft SWRSS). Although the other adjoining authorities are proposing to provide roughly the same level as previously proposed it is unlikely that these will be able to meet the unmet need of Bournemouth and Purbeck in particular. Having reviewed the “What Homes Where?” toolkit for each of these authorities and their respective SHMAAs it is clear that the level of need is significantly higher and that there is a shortfall in the region of 12,000-16,000 homes over the plan period across the authorities.
- 2.17 Whilst it is recognised that due to the constraints present in both East Dorset and Christchurch, in particular proximity to the Dorset Heaths Special Protection Area, it is unlikely that the authorities would be able to fully meet the outstanding needs of adjoining authorities, the authorities should seek to meet these needs where possible. As such, where sites of a strategic nature are able to demonstrate their suitability for residential development and have been the subject of appropriate testing by the authorities, these should be allocated.

Delivery of the housing target

- 2.18 We have raised concerns in our previous representations that the Plan overall is heavily reliant on dwellings from within urban areas for over 50% of its housing target. From our experience within other authorities we question the deliverability of this level of completions within the urban areas.

- 2.19 To meet the identified housing target, Policy KS3 states that 4,800 new homes will be from within the urban areas with 3,400 dwellings provided as new neighbourhoods. Given the change proposed above these sources will need to provide a minimum of an additional 316 dwellings.
- 2.20 The Councils state that if delivery falls significantly below the housing target “*the Councils will undertake a partial review of the Core Strategy*” but the Council must ensure that its housing provision is as robust as possible at the point of adoption. This highlights the importance of the proposed new neighbourhoods to the achievement of the objectives of the Core Strategy both in terms of housing and its wider aspirations.
- 2.21 Given the increase in the housing target proposed above, it will be necessary for the Councils to allocate additional sites to meet their housing target. It is therefore vital that site VTSW5, which has already been subject to full site selection procedures and evidence base studies, and judged suitable and available, should be reinstated as an allocation for residential development of 65 dwellings.

5. Should the housing provision:

- **Allow 10% for vacancy rates and second homes?**

- 2.22 The Core Strategy housing target is to provide a 10% contingency above the identified housing need. The 10% buffer is to ensure the Core Strategy is sufficiently flexible to respond to changing circumstances during the plan period and is considered in more detail above. This is of particular importance given the increased scale of growth in the latest household growth projections.
- 2.23 As set out above, we have recommended that the housing need figure referred to by the Council in the Core Strategy, be increased to 7,742 dwellings in line with the need identified in the Council’s assessment of the impact of the newly published 2011 Census based Office of National Statistics household projections. An associated increase of the housing target to 8,516 dwellings is recommended which would provide for the 10% buffer over the level of need.
- 2.24 Given the nature of the authority areas and the desirability of these areas for holiday homes, it is likely that a significant proportion of second homes will exist. Typically a second home allowance of 1.1% is applied, although a higher percentage may be justifiable in this case given the nature of the authority areas. In addition, the Bournemouth and Poole SHMA recommends the inclusion of a 2.5% allowance for vacant dwellings.
- 2.25 The inclusion of a minimum 3.6% allowance would increase the level of need from the 7,742 dwellings indicated in the Council’s August 2013 update paper, to 8,021. This, in turn, would increase the overall target to 8,823 dwellings once the 10% flexibility allowance is included.
- 2.26 There is, therefore, a strong argument that the Councils’ housing target should be 8,823 dwellings.

- **Provide a separate target for each Council area?**

- 2.27 The Councils have proposed a single housing target of 8,200 homes across the two authorities, with 3,400 of these coming from new neighbourhoods. It is our understanding that the housing targets were combined to a single target for the whole plan area on the advice of the Planning Inspectorate. We have no in-principle objection to the use of a single housing target for the two authorities; however this was introduced at a relatively late stage in the plan making process. As

such the evidence base has largely not been prepared on the basis of a single housing target which leads to some issues with assessing the soundness of the plan.

- 2.28 This is particularly the case with regards to the Strategic Housing Land Availability Assessment (SHLAA). It is understood that the Councils intend that future versions of the SHLAA will be jointly prepared to cover both authorities and this will be helpful in interpretation going forward. Given the significance of the amendment to change to a single housing target an updated unified SHLAA should be prepared as part of the evidence base for the Joint Core Strategy prior to its adoption to ensure that the evidence base is consistent with and supports the proposed approach and to accurately assess the soundness of the Joint Core Strategy.

8. Is the need for housing to be located outside the urban areas / in the green belt justified by the SHLAA and other evidence?

- 2.29 Chapter 4 of the pre-submission Core Strategy sets out the overall vision for the authorities. In terms of the provision of housing the Vision states:

“The unmet housing needs of the area will be reduced, with housing delivered of a type and tenure which meets the aspirations of those wishing to buy or rent. An element of this housing will be in the form of new, well planned, sustainable residential areas in both Christchurch and East Dorset. These will be attractive new areas, including high quality and sustainable homes, areas of open space, new community facilities, and improved transport links to the surrounding area.

Housing will also continue to be delivered from redevelopment within the existing towns, but developments will now better reflect the character and type of housing found in each local area, and will make appropriate contributions to infrastructure. Almost all new housing development will contribute to the provision of affordable housing, creating a step change in delivery of affordable dwellings and a significant reduction in waiting lists.

The Green Belt policy will be kept in place to protect the character of the area, subject to limited alterations of boundaries to enable its extension and elsewhere to allow for some housing and employment growth to help meet the needs of the local communities.”

- 2.30 The Council have proposed a housing target of 8,200 new dwellings to be provided across the plan period. As set out above, we recommend that this is increased to a minimum of 8,516 new dwellings to allow a minimum 10% contingency over the identified need for 7,742 new homes. The inclusion of a 2.5% vacancy allowance and 1.1% second home allowance would increase the level of need from 7,742 to 8,021 and with the 10% flexibility allowance, the target would rise to 8,823
- 2.31 Notwithstanding the above suggested increase, it is clear that the authorities require the delivery of housing outside the urban areas, in some instances in the Green Belt. The Councils have identified 4,800 dwellings to come forward from within the urban areas, based on the Councils respective SHLAAs. This is therefore significantly below the identified need and housing target, aside from the concerns raised above regarding the deliverability of this level of housing from within the urban areas. There is therefore a clearly justified need for housing outside the urban areas / in the Green Belt which the Councils have sought to respond to. The approach adopted by the Councils is therefore considered to be sound.

3. RECOMMENDED CHANGES

3.1 In summary we recommend that the following changes are made to the Joint Core Strategy:

- The housing need of the authorities should be identified as at least 7,742 dwellings over the plan period, with a strong case (within the Council's own evidence base) to increase this to 8,021 to allow for a 2.5% vacancy rate and a 1.1% second homes allowance.
- Policy KS3 should be amended to increase the housing target to 8,516 dwellings as a minimum target (based on a need of 7,742 plus 10% flexibility) or, more realistically, 8,823 dwellings (based on a need of 8,021 plus 10% flexibility).
- Site VTSW5 at north east Verwood should be reallocated for up to 65 dwellings.



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