



Dorchester Civic Society

An Independent Voice

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West Dorset and Weymouth & Portland Local Plan Examination: 25 November - 12 December 2014

Supplementary Statement by Dorchester Civic Society (ID 611)

Dorchester Civic Society wishes to re-iterate and expand upon its support for the draft local plan particularly in response to those objections being made on the soundness of the plan in relation to housing land supply and need.

It is beyond the resources of the Society to do a detailed analysis of all the objections made on these grounds. However the Society has given some consideration to the objections made by Grainger plc (objector ID 648), Persimmon Homes (objector ID 797) and the Home Builders Federation (objector ID 3840).

What these objections appear to have in common is whether or not the housing needs assessment and resulting housing land allocations is sound. The starting point of these objections refers to the NPPF Para. 47 that begins by stating:

"To boost significantly the supply of housing local planning authorities should:" ...

followed by five bullet points detailing expectations of local planning authorities.

There is no indication in the NPPF as to the base line from which a 'significant boost' is required. It can only be inferred that given that the NPPF was published in May 2012 the base line was the low level of housing completions at that time. Housing completions in the area covered by the draft plan were 546 in 2011/12 and 570 in 2012/13 against an average over the period 2000/01 – 2012/13 of 689 with a maximum in that period of 923 in 2005/06 (Dorset County Council housing completions).

A study by the Pegasus Group, commissioned on behalf of the Grainger plc and Persimmon Homes, suggests that the starting point should be a comparison with the proposals in the draft Regional Spatial Strategy and county structure plan (Para. 2.3/2.4 of their report). There is no justification for this comparison. Indeed it is instructive to look at the Secretary of State's statement of the 27 March 2013 abolishing these planning documents:

"The abolition of these unpopular and counter-productive Regional Strategies reinforces the importance of councils' Local Plans produced with the involvement of local communities as the keystone of the planning system. It is this approach that will deliver the houses, jobs and infrastructure we need."

"The Government is also revoking the remaining, outdated county level structure plan policies in these areas."

There is much detailed analysis of the various inputs that can be used in housing need modelling and the results obtained. The question is not what all the alternatives are, rather it should be whether what has been done is 'sound' when judged in terms of the requirements of Para. 47 of the NPPF: objectively assessed development and infrastructure requirements; an appropriate strategy when considered against reasonable alternatives; based on proportionate evidence; and deliverable over the plan period.

The Pegasus Group on behalf of Persimmon Homes and Grainger plc have conducted a detailed analysis of housing requirements using the Chelmer Model. At Table 23 they set out the annual housing requirements derived from the five scenarios studied. The annual housing supply required under these scenarios range from 670 units under Scenario 1 to 1,339 units under Scenario 4. It is perhaps important to note that the number of units required per year under Scenarios 1, 2 and 5, 670, 735 and 775 respectively, would all be met by the draft local plan allocation of 775 units per year. It is only Scenarios 3 and 4, requiring 1,015 and 1,339 units respectively, that are not fully met by the plans proposals. The question must be if either of these scenarios is a more realistic appraisal of housing requirements, is this a fatal flaw in the plan so as to make it 'unsound'?

Dorchester Civic Society does not have the resources to study each of the scenarios to make its own assessment of which of the five scenarios is the most appropriate. However even if Scenario 4 is the most appropriate the local plan provision for 13,175 amounts to a ten-year supply of land.

The NPPF at Para 47 refers to the need to identify housing land supply in the following terms:

"(I) identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;"

The minimum requirement for a ten-year supply is met in the case of Scenario 4. The fact that a supply for years 10-15 is not identified in the plan does not make the plan unsound.

The Chelmer Model, as all modelling of housing land supply requirements, looks at the theoretical need. The local plan is then required to provide for the appropriate land supply to be made. What this process does not do is build the houses. It is instructive to look at the number of housing completions in the two districts for the period 2000 - 2013. The average number of houses completed per year over this period is 689 with a range of 923 in 2005/06 to 354 in 2009/10. In 2012/13 the number of completions was 570. Even if Scenario 4 is accepted it is inconceivable that in the first five years of the plan the local building industry will have anything like the resources to build at the rate of 1,339 units per year. Can it be 'sound' to reject a local plan on planned provision for housing on the basis that the theoretical need in terms of housing numbers is not met without reference to the actual numbers of houses built? It is, perhaps, a flaw in the process that whilst theoretical need drives land supply it does not drive housing supply that is by and large left to market conditions which is a matter outside the control of the planning authority.

The Society recognises there will be a need for a strategic review across the two districts to determine future housing land supply beyond 2025 at the earliest. It is the Society's firm conviction that that this should be the subject of a thorough strategic review with effective public consultation and debate and that it should not happen in a rushed manner against a background of no local plan.

The 'sound' decision to be made in the case of the West Dorset, Weymouth & Portland Local Plan is that the housing land supply meets a ten-year supply even in the highest scenario a supply that at least for the first five years has no practical chance of being achieved. A more realistic assessment is that there is sufficient land to accommodate 10-15 years of housing requirements and that a proper strategic review can only take place against the sound foundations of an approved local plan.

6 November 2014