



Gladman Developments Ltd

West Dorset, Weymouth and Portland Joint Plan EiP Hearing Statement

Matter 3 Spatial Strategy

Q3.1 Are there alternative development options which would deliver a more effective and sustainable development strategy?

Q3.2 Is the overall distribution of housing and employment appropriate to the needs of the two areas?

1 The development strategy proposed by the submitted Joint Local Plan (Chapter 3) concentrates the future growth requirements of the authorities towards the main towns and settlements in the plan area. Gladman do not disagree that growth planned to be delivered should be concentrated towards these settlements on account of their important role in the district, sustainability and capacity to accommodate growth. However the reliance of the plan on strategic sites and lack of definition provided towards growth in the rural areas risks the plans deliverability and effectiveness in meeting identified needs and securing existing sustainability. Gladman consider the spatial strategy therefore to be unsound.

Strategic Sites

2 The plan will deliver 5,355 dwellings on 9 sites during the plan period, representing 53% of the revised plan requirement. Whilst the role of strategic sites is confirmed by §52 of the Framework, the complexity of the issues facing these sites especially in the early stages of their development (landownership, financing, legal agreements, on-site issues) means that the timing of their delivery can often be uncertain. This is demonstrated by the changes proposed by the tracked changed version of the submission plan, with identified yields of several sites reducing, in some cases significantly (for example Barton Farm from 800 to 279 dwellings and Land at Crossways from 1,200 to 500 dwellings).

- 3 The over reliance by the plan on the delivery of strategic sites risks the ability of the Council to meet annual requirements and maintain a five year land supply. The Council should instead distribute a greater proportion of the planned growth towards smaller greenfield site located around the town. These sites are less sensitive to the issues faced by strategic sites and able to deliver housing in a relatively short timescales. A broad spatial strategy would provide for market choice and completion that would boost the prospects that the planned requirement will be delivered in full within the plan period.

Rural Growth

- 4 The approach to growth, beyond allocations and extant permissions is defined in Policy Sus 2 of the plan. Here, the policy outlines that in rural areas development outside defined settlements boundaries (carried forward from the previous plan) will be strictly controlled.
- 5 The Council justify their approach in paragraph 3.3.14 of the submitted plan outlining that *“although a lot of demand exists in the rural areas, allocations or extensions to defined development boundaries have not been made in these locations...[due to]... problems associated with providing development in locations that have few facilities and where people tend to commute to the towns. It is more difficult to provide cost-effective local services for a more dispersed pattern of development, without putting greater reliance on unworkable public transport solutions...”*
- 6 Gladman consider the strategy and justification for the approach taken by the Council's towards housing in the rural area reflects a misunderstanding/interpretation of the Framework and supporting national guidance. §28 of the Framework is clear that *“plans should promote the retention and development of local services and community facilities in villages”* yet the justification outlined in paragraph 3.3.14 would implicate the opposite, with the Council refusing to support rural communities due to the cost implications of service provision in the rural areas.
- 7 It is clear that the plans approach reflects the Council's failure to prepare the Joint Plan mindful of the contents of the rural housing chapter of PPG. This chapter¹ underlines the importance of the needs and issues faced by rural communities need to be recognised by local authorities, with rural housing providing an essential role in securing the viable future use of local facilities that enable thriving communities. The implementation of the strategy proposed by Policy Sus 2 is directly contradictory to PPG which outlines that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies

¹ See PPG ID 50-001-20140306

restricting housing development in some settlements and preventing other settlements from expanding should be avoided.

- 8 Yetminster for example is located on the Bristol to Weymouth railway line and served by the number 74 and 212 bus routes providing choice in sustainably access to wider services and employment sources. The village has a local primary school, pub, food store, post office and doctors surgery. The village is one of the few settlements in the district that is located outside the AONB. Given these characteristics, the village is able to accommodate growth and should be provided with housing in the plan period to meet housing needs and support existing services.
- 9 The Council's may argue that they have accounted for rural needs through the provision made for neighbourhood plans. However, there is no statutory requirement to produce neighbourhood plans. This means that should plans not be forthcoming during the plan period as hoped by the Council's, the application of Policy Sus 2 would deliver minimal growth in the rural settlements and render the local plan undeliverable.
- 10 PPG outlines that neighbourhood plans cannot deliver less growth than proposed by the Local Plan, with more growth allowed if evidenced. The development plan in this case however does not establish a minimum level of growth. Therefore should a neighbourhood plan fail to allocate or allow for any development in its proposals it would still be in compliance with the Local Plan. The strategy implemented by the Council's does not therefore support any growth in the rural areas. The approach is unsound.
- 11 In order to address these issues, Gladman believe the following two changes are necessary. Firstly, the Council must clarify the level of rural development needs and where these needs will be met during the plan period through a radically revised settlement hierarchy according to an appraisal of housing need, settlement services, and settlement role. Secondly, the approach to growth outside the settlement boundary as applied by Policy Sus 2 must also be revised. In order to enable the delivery of sustainable development within the rural areas in the interim period until neighbourhood plans come forward for approval, Gladman submit the following revised wording.

"Development adjoining the settlement boundary will be permitted in the open countryside provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of doing so."

Q3.5 Is the latest assessment of housing robust and representative of the needs of the two authority areas?

- 12 Gladman do not consider the updated SHMA to be a robust or an adequate assessment of needs for the Joint Plan area. The methodology used by Part 1 of the SHMA in defining housing needs lacks sufficient transparency with regard to the assumptions made regarding commuting. It is therefore unknown whether these assumptions are realistic or appropriate.
- 13 The report further fails to test economic needs in relation to the labour force as outlined in PPG² based on an unfounded assertion that using a jobs-led housing need figure is flawed; despite being a well-established approach. As a result of the stance taken by the report there is no way of knowing whether the trend based scenario providing the basis of the revised requirement would meet economic forecasts as it is not tested by the report.

Q3.6 Is the phasing regime and housing trajectory realistic, appropriate and deliverable and capable of providing an adequate supply of housing land?

Housing Trajectory

- 14 Gladman do not consider the submitted housing trajectory as published in the July 2014 SHLAA to be sound. Gladman are concerned with the inclusion of "large identified sites" in the five year land supply, and the reliance placed by the plan on the delivery of sites in the trajectory that currently lack any commitment.
- 15 The housing trajectory includes provision from "large identified sites" within the five year land supply that do not benefit from planning permission. Gladman do not consider that such sites should be included within the claimed five year supply. The delivery rate identified in the trajectory is not supported by extant permissions or allocations but rather a SHLAA response form indicating what the promoter envisages the land supply to be; often reflecting an optimistic position. Gladman do not deny that a level of growth will be achieved from this source of land supply during the next five years, however it is certain that since none of these sites benefit from outline planning permission there will be no delivery from these sites in 2015/16 or 2016/17.
- 16 According to the 2014 SHLAA, 4,737 dwellings will come forward from sites that neither benefit from planning permission nor are allocated by the plan. This amounts to 40% of the housing proposed to be delivered within the Joint Plan area in the remaining plan period. This

² See Planning Practice Guidance Paragraph 18 Ref ID: 2a-018-20140306

is a significant reliance by the plan on what would typically be classed as windfall development, with the source of supply from such sites amounting to 338 dwellings per year. There is no evidence submitted that this level of windfall delivery can be or ever has been achieved in West Dorset, Weymouth and Portland.

- 17 The approach taken by the Council risks the deliverability of the plan requirement. The housing trajectory must be reassessed with delivery from large sites lacking permission in 2015/16 and 2016/17 being omitted from the five year land supply. In addition, the reliance on future windfall development is too great. There is a pressing need therefore for the Council to identify and allocate further sites.

Supply of housing land

- 18 The recent further changes consultation of the Joint Plan adjusted the end of the plan period from 2031 to 2028. The implication of this means that should the Joint Plan be adopted in 2015, the plan will only have a 13 year time horizon. This puts the plan in conflict with §157 of the Framework.
- 19 The Council justify this modification to the plan on account that it would be necessary to identify further sites in West Dorset to meet the objectively assessed needs to 2031, and given the time constraints would not be possible in the plan period. Gladman do not consider this to be a valid reason to cut short the plan period. In preparation for the plan, the Council will have identified sites that are potentially suitable for housing in the plan period, the 2014 SHLAA identifies a supply of 12,536 for the remaining plan period but has only been drawn up until 2028. The Council is therefore ignoring the issue on purpose with the scope of the SHLAA limited to the revised plan period.
- 20 It is not impossible for an additional land supply to be identified during the suspension of an examination. At the examination of the Cherwell District Plan, the Council were required to a land supply, 41% higher than originally submitted. The Main Modifications to the plan were published four months later with allocations defining how this was going to be achieved.
- 21 Delving deeper into the appendices of the 2014 SHLAA unveils the fact that there is a potential supply of 10,040 net dwellings from submitted/identified large sites with development potential. This is 6,683 dwellings higher than that claimed as a potential land supply by the proposed changes. There is therefore significant potential for the Council to deliver its full housing needs to 2031.

22 Gladman submit that the plan period must be revised to 2031.

Q3.7 Would the LP provide a 5 year housing land supply on adoption having regard to the need for an appropriate buffer?

23 In consideration of the comments made by Gladman in response to question 3.6, it is clear that the Councils cannot demonstrate a five year land supply. The inclusion in the five year supply of sites that do not benefit from planning permission or allocation through the local plan is unsound. The housing trajectory provided in the 2014 SHLAA outlines that 1,588 dwellings (28% of the total five year claim) lack planning permission or allocation. This represents a significant reliance by the plan on sites coming forward for development where there is no guarantee/commitment of delivery. Gladman accept that there will be some provision provided from this source of supply, however do not consider that it will be to the extent as outlined by the Councils.

24 Gladman object to the inclusion in the supply of delivery from large sites that currently lack planning permission in 2015/16 or 2016/17. Accounting for this, Gladman submit that delivery from this source of supply should be off-set by two years, therefore seeing the delivery of 134 dwellings in 2017/18 and 267 dwellings in 2018/19, but retaining the 237 dwellings identified to be delivered on sites below 0.15ha in recognition of their smaller scale. The consequence of this is to see a reduction of 698 dwellings from the claimed supply, resulting in an overall land supply of 4,929 dwellings. This calculation in Gladman's view represents the very best case scenario for the Council's housing land supply as this calculation does not test assumptions made by the Council of other components in the supply.

25 Gladman support the calculation of housing need over the next five years made by the Council in the 2014 SHLAA. The SHLAA identifies a five year supply need amounting to 5,471 dwellings based on the emerging joint plan requirement of 775 dwellings, a 20% buffer for persistent under delivery, and shortfall arising in the plan period since 2011 (821 dwellings). Against the land supply identified above, Gladman calculate the Council's to claim a **4.5 year supply**.

26 It should be noted that the calculation made above retains emerging allocations made by the joint local plan that are yet to benefit from planning permission. The adoption of the plan in this case will not therefore provide the Council's with a five year claim.

27 Against this context Gladman consider that there is need for a further suspension of the West Dorset, Weymouth and Portland Local Plan examination to enable the Council to identify and

allocate sufficient sites in order to claim a five year supply. This approach is necessary to ensure that the housing policies of the joint plan are not instantly rendered out-of-date under the provisions of §49 of the Framework due to the lack of a five year supply, and is an approach that has been applied by Inspectors examining local plans in Amber Valley and East Cambridgeshire.