

Examination of West Dorset, Weymouth and Portland Local Plan

Statement on Matter 4: Housing Policy

Introduction

This statement has been prepared by RPS on behalf of Taylor Wimpey UK Ltd in response to the Inspector's questions on Matter 4: Housing Policy.

The Statement specifically deals with the following:

- Question 4.1 – Are the targets for affordable housing appropriate?
- Question 4.4 – Is it clear what the approach is to housing proposals beyond settlement boundaries?

In respect of the other issues raised by the Inspector, Taylor Wimpey is content to rely on previous written submissions on the Further Proposed Changes to the Plan and on oral submissions at the Examination.

Inspector's Question 4.1 – Are the targets for affordable housing appropriate?

1. We have previously made detailed responses in respect of the issues that will be considered at Matter 3 of the Examination relating to the Spatial Strategy of the Plan. In particular, we are concerned that the Joint Plan has not adopted an appropriate, robust or rigorous assessment of the full Objectively Assessed Need (OAN) as required by National Policy, including on the basis that:
 - It is deficient in appraising the realistic likelihood of future economic growth and the levels of job growth to be experienced across the Plan period
 - It is not transparent regarding its demographic assumptions.
 - The level of employment land is maintained at 60.3ha in the Plan and yet this is associated with the provision of some 16,100 jobs, not the 2,300 now proposed. Therefore the Council is proposing to plan for less housing linked to a demographic based economic projection and yet provide 60.3ha of employment land with the outcome of this being that there will be significantly more jobs in the area than can be accommodated by the indigenous workforce resulting in unsustainable commuting
2. The fact, in our opinion, that the Plan is not meeting its full OAN sets the context for Taylor Wimpey's concerns on the appropriateness of the approach adopted in

respect of affordable housing. Likewise, our response to the Further Proposed Changes (September 2014) consultation sets out Taylor Wimpey's concerns on the intention to adopt a single plan-wide housing requirement .

3. Whilst we don't repeat these concerns in detail as part of this Statement in, we consider that there is a clear relationship between the single plan wide requirement and the ability to meet the need for affordable homes in a particular part of the Plan area. That is to say, it is simply not appropriate to meet the affordable housing needs of West Dorset at Portland and/or Weymouth or, indeed, vis-versa.
4. It must be recognised that the majority of new affordable homes, regardless of tenure, will be delivered as a component of market led schemes. Taylor Wimpey, subject to necessary safeguards including in respect of viability and reasonableness. It is also therefore logical to assume that if the Plan fails to meet its full objectively assessed need, it will also be likely to fail to meet the need for affordable housing.
5. Taylor Wimpey's position that that the Plan's identified housing requirement of 775 dwellings per annum is insufficient and unsound is well documented. Notwithstanding this, a 30% affordable housing provision/requirement would equate to 232 affordable dwellings being provided per annum. This closely accords with the West Dorset, Weymouth and Portland Strategic Housing Market Assessment (SHMAA) which suggested an affordable housing requirement of 234 dwellings per annum of which 104 dwellings per annum is required in West Dorset.
6. Whilst the SMAA considers that this represents the "true requirement" for affordable housing, it is important to note that these figures have been discounted downwards introducing variables including by varying rent payments, factoring in households sharing accommodation and the role of the private rental sector.
7. The 234 dwellings per annum figure is not therefore an assessment of the full OAN for affordable housing and it also does not represent a "policy off" starting point for understanding the true need. Without prejudice to our concerns on the methodology used in the SHMAA, that document identifies a net affordable housing need as follows:
 - West Dorset – 362 dwellings per annum
 - Weymouth & Portland – 423 dwellings per annum
8. Therefore, if the Councils' own SHMAA is to be believed, the true net need for affordable housing is 785 dwellings per annum; that is to say greater than the Plan's total housing target of 775 dwellings per annum. Taken a stage further and based on a 30% policy requirement, it could be argued that the Plan should be providing for a total of 2616 dwellings per annum to meet the net affordable OAN.

9. We accept that there are other factors which could be applied in respect of a “policy on” approach, however, the above serves to demonstrate the significant nature of the Plan’s shortfall in terms of its overall housing requirement and, specifically, in respect of affordable housing. Indeed we note that the Director of Environment of the Councils stated at the Exploratory meeting that

“..the option of allowing land for development of sufficient total housing to supply the required amount of affordable housing is neither feasible or deliverable - it would require nearly 5,000 dwellings to be constructed per annum!” (Exploratory Meeting – Councils’ Opening Statement; 22nd January 2014).

10. Taylor Wimpey considers that there are appropriate and deliverable sites that could and should be identified as part of a **positively prepared** Plan which would make a significant contribution to rectifying this matter. This is on sharp contrast to the position adopted by the Councils, including at the Exploratory meeting, that there is no prospect of addressing the requirement for affordable housing.
11. In conclusion to question 4.1 therefore, Taylor Wimpey considers that both the approach and targets for affordable housing are inappropriate.

Question 4.4 – Is it clear what the approach is to housing proposals beyond settlement boundaries?

12. Taylor Wimpey is concerned that the Plan’s approach to housing proposals beyond settlement boundaries is unduly restrictive and lacks clarity in that it does not comprehensively deal with scenarios that are predictable.
13. Neither Policy HOUS 6, or its supporting text, can be considered to be positively prepared. In that respect, the Plan fails to respond to National Policy both in respect of the presumption in favour of sustainable development and the Government’s requirements to boost significantly the supply of housing.
14. The starting position adopted by the Plan appears, instead, to be that development outside of development boundaries is automatically unsustainable. This seems to result from an attitude that “*development in the countryside outside defined development boundaries*” (paragraph 5.7.1 of the Plan) must mean development some distance away from the services and facilities that exist in settlements. The Plan then limits any further consideration to affordable housing exception schemes, the extension, subdivision or replacement of existing dwellings and rural workers accommodation

15. We consider that this fails to objectively consider the potential for residential development on sites that are immediately adjacent to development boundaries. In such cases, proposals often benefit from good access to services and facilities and may even contribute to improving the sustainability of the locality.

16. We therefore request that the Plan be modified to provide recognition that development proposals adjacent to existing boundaries may in fact offer a sustainable opportunity to boost the supply of housing. This flexibility, rather than a slavish adherence to policy, would be entirely appropriate in the context of a Plan in which housing numbers are expressed as an “about” figure and in circumstances where a five year supply of housing sites cannot be demonstrated.