



## North Dorset Local Plan Examination

Issue 4: Meeting Housing Needs, including affordable housing and the needs of gypsies, travellers and travelling showpeople (policies 6 to 10 and policy 26). Thursday 12 March 10.00am.  
The Crown Estate (ref: 2986)

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### Comments on the Council's approach to meeting housing needs, including affordable housing (Policy 6)

#### *What Part of Local Plan Part 1 is unsound*

- 1.1 The Crown Estate considers the housing target set out in Policy 6 'Housing Distribution' to be unsound.

#### *Which soundness criterion does it fail*

- 1.2 Policy 6 is unsound because it is not consistent with national planning policy, is not positively prepared, justified or effective.

#### *Why it fails*

- 1.3 Policy 6 plans for the delivery of 4,200 homes in the period 2011 to 2026. The bulk of this growth will be split between the four main towns. Whilst The Crown Estate supports the spatial strategy (see response to Question 1.5) it is concerned that the level of growth currently set out in Policy 6 does not provide a sound basis to meet housing needs in the District over the plan period for the following reasons:

#### The housing target is not ambitious enough in context of NPPF (questions 4.2, 4.4 and 4.12)

- 1.4 The basis of the Council's chosen housing target is set out a housing background paper<sup>1</sup> (reference MNH001). This outlines that the Council's chosen housing target is based on evidence supplied in the 2011 SHMA update. This concludes that the Council's original target of 350 dpa (based on the emerging Regional Spatial Strategy for the South West of 7,000 dwellings 2006 to 2026) was no longer an appropriate target as a result of the economic downturn (paragraph 4.29). Based on economic conditions at the time this recommended a lower target of 280 dpa (4,000 dwellings 2011 to 2026).
- 1.5 The Crown Estate is concerned that the level of growth set out in the Plan is not ambitious enough in the context of NPPF and will not adequately address housing needs. It is considered that the Council has over emphasised the impact of the economic downturn in determining its housing requirement, a point made in paragraph 7.1 of the housing background paper which states:

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<sup>1</sup> North Dorset Local Plan 2011 to 2026 Part 1 Meeting Housing Needs Background paper (paragraph 4.29 page 19)

*“Future housing needs have been reassessed in studies which have been updated to take account of changes to the planning system and the downturn in the economy. These studies show a reduced overall need for housing, but a continuing need for affordable housing.”*

- 1.6 It is considered that subsequently this figure is not ambitious enough and does not reflect guidance in NPPF to ‘*boost significantly the supply of housing*’. It does not provide a sound basis on which to plan for longer term needs over the remainder of the plan period.
- 1.7 The Council has provided no evidence that it has explored a higher figure which more effectively addresses housing need over the plan period and therefore the target of 280 dpa is not justified. Past supply prior to the recession significantly outperformed the Council’s current target with an annual average of 370 dpa being built in the period 2001 to 2011.
- 1.8 In the Council’s response to the Inspector’s question 3 (ref INS008) they state at paragraph 2.8 that the 2008-based household projections rebased to 2011 using Council Tax data, represent the most robust annualised average housing provision figure available for North Dorset. However, the Planning Practice Guidance states at paragraph 15 that household projections provide the starting point for estimating the overall housing need. In addition, the Council will need to take into account employment trends and affordable housing needs. It is not clear that the Council’s approach is fully justified in these two respects.
- 1.9 In paragraph 18 of the Planning Practice Guidance it advises that Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also have regard to the growth of the working age population in the housing market area. In paragraph 2.17 of the Council’s response to Inspector’s question 3 (ref INS008) they state that the work on economic projections is on-going and will be concluded alongside the consideration of the 2012-based household projections once published by DCLG. It is therefore not clear that market signals over the lifetime of the plan are reflected in the Council’s current housing figure.
- 1.10 In terms of affordable housing, the SMHA report identifies a much bigger need for affordable housing than will currently be provided for through the Local Plan. The housing background paper<sup>2</sup> identifies an annual need of 387 affordable dwellings. However, the chosen target will not address the significant affordable need in the District. In the period 2003 to 2014 the Council delivered 922 affordable dwellings (an annual average of 83 dwellings per annum). This was delivered from a period when delivery rates were much higher (see paragraph 1.7 above). With a lower housing target of 280 dpa now proposed the Council will not address affordable housing needs. Paragraph 29 of the Planning Practice Guidance states that an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes. Again it is not clear this has been fully considered in arriving at the Council’s chosen housing figure and they may need to consider a higher target which boosts the supply of housing, including affordable needs.
- 1.11 To provide a more positive strategy which significantly boosts housing supply, the Council will need to give consideration to a higher rate of growth and allocate additional sites accordingly. Increasing the number of allocations would be consistent with the call to *significantly boost housing delivery* as required by paragraph 47 of NPPF. This should include additional land at Blandford Forum on The Crown Estate’s land which the Council’s evidence base clearly sees as one of the most sustainable locations for growth (see response to Issues 1 and 7).

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<sup>2</sup> North Dorset Local Plan 2011 to 2026 Part 1 Meeting Housing Needs Background paper paragraph 7.5 (page 41)

The Plan Period will not cover a full 15 year period post adoption

- 1.12 As outlined in our response to Inspector's question 1.12 The Crown Estate questions whether the current time horizon of 2011-2026 (as stated in Policy 6) provides an appropriate timeframe for the Local Plan on the basis of NPPF. Paragraph 157 suggests a 15 year time horizon. Paragraph 47 also requires local planning authorities to identify a specific supply of developable sites or broad locations for years 6-10 and, where possible, for years 11-15 and update this annually.
- 1.13 The Crown Estate considers that the time horizon of the Plan needs extending by four years to ensure a period of 15 years following the adoption of the Plan is covered (assuming the Plan is adopted later in 2015). Accordingly, following the extension of the plan period, four additional years should be added to the District wide housing requirement set out in Policy 6.
- 1.14 In order to ensure the delivery of the plan and maintain a flexible supply of housing, further allocations should be made in sustainable locations such as Blandford, including on The Crown Estate's extensive land ownership including land at West Blandford which can accommodate growth to assist the Council in meeting its development needs over the longer plan period (see our response to question 1.4 and 7.1).

The Council has not prepared a housing trajectory (question 4.7)

- 1.15 Paragraph 47 of NPPF states that Councils will be expected to illustrate the expected rate of housing delivery over the plan period through a housing trajectory. The Council has not yet prepared a housing trajectory to demonstrate how it would implement the strategy to deliver the number of homes set out in Policy 6 and maintain a deliverable supply of sites.
- 1.16 Therefore, in order to be found sound, the Council should prepare a housing trajectory. This should set out a deliverable supply of sites covering a 15 year period from the date of adoption. It should also show a positive position in significantly boosting housing supply and demonstrate how it can more effectively meet the objectively assessed needs over the lifetime of the plan. As sites are not allocated in Local Plan Part 1 (save for Gillingham) it may be difficult for the Council to demonstrate a deliverable supply of sites at the current time.
- 1.17 Preparing a trajectory would help to demonstrate the soundness of the Plan and support the emphasis of NPPF which seeks to ensure local plans are **positively prepared** (paragraph 182) and **significantly boost housing supply** (paragraph 47).

The current settlement boundaries could hinder the Council's ability to maintain a five year supply (Question 4.6)

- 1.18 The Council's AMR<sup>3</sup> demonstrates that many of the draft allocations identified through this Plan are included within the Council's five year supply. However, the majority of these are currently located outside of the settlement boundary (save for Gillingham).
- 1.19 Although Policy 2 has been amended to state that the settlement boundaries will apply in conjunction with the broad locations for growth (such as those in Policy 16) these areas are not actually defined in this plan and the policy is currently ambiguous. The Local Plan Part 2 may not be adopted until 2017 at the earliest. This could impact on the Council's ability to maintain a deliverable five year supply of housing land supply. Without the draft allocations currently included in the five

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<sup>3</sup> North Dorset District Council Annual Monitoring Report 2014.



year supply (864) and constrained supply (51), the Council would only be able to demonstrate a 3.8 year supply of housing. This is at the very least an uncertainty for developers.

- 1.20 In line with our response to Policy 2 (see statement with regard to Issue 1) it is therefore recommended to meet the tests of soundness set out in NPPF (particularly justified, positively prepared and effective) that settlement boundaries should be removed to provide a more positive strategy to deliver the District's development needs.

#### *How can Local Plan Part 1 be made sound*

- 1.21 In summary, in order to be found and meet the requirements of NPPF we recommend the following changes to Policy 6;

1. The Council should give consideration to a higher housing number which is not overly dependent on the recession scenario and better addresses the significant housing needs in the District to provide a more positive growth strategy.
2. The plan period should be changed from 2011 to 2026 as currently proposed to 2011 to 2030. This would ensure the housing requirement covers a full 15 year time horizon as suggested by NPPF and ensure the Plan prepares for longer term needs and is up to date in the context of NPPF.
3. The Council should prepare a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF. This should set out a deliverable supply of sites covering a 15 year period from the date of adoption.
4. The Plan needs to be specific about strategic sites (see our response to Issue 1) and allocate more sites to better address housing needs.
5. More flexibility needs to be added Policy 2 (Settlement boundaries) to ensure strategic sites are allocated in the Local Plan Part 1 and enable more sites to come forward to maintain a deliverable five year supply of land. The Council may also need to consider deleting/amending policy 20 which currently provides a conflict with Policy 2 and does not enable the Council to bring forward further sites.

#### *Precise changes/wording sought*

Suggested amendment to Policy 6 assuming a target of at least 280 dpa to cover a full 15 year period following adoption:

At least ~~4,350~~ 5,320 net additional homes will be provided in North Dorset between 2011 and ~~2026~~ 2030 at an average annual rate of about 280 dwellings per annum. The vast majority of housing growth will be concentrated at the District's four main towns of Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton.

The approximate scale of housing development at the four main towns during the period 2011 - 2030 will be as follows:

- a Blandford (Forum and St. Mary) - about ~~1,110~~ - 1,383 homes;
- b Gillingham – about ~~1,490~~ 1,809 homes;
- c Shaftesbury – about ~~1,140~~ 1,383 homes;
- d Sturminster Newton – about ~~380~~ 479 homes.



## Response to additional Inspectors Questions

*Question 4.10: Is the proposed housing distribution (policy 6) based on a sound assessment of land availability and delivery? Is there any evidence that the proposed distribution cannot be satisfactorily achieved?*

- 1.22 The Crown Estate broadly supports the spatial strategy and the identification of Blandford Forum as a 'main town' in recognition of the town's role as a service centre in the southern part of the district. It also supports the allocation of at least 26 per cent of the District's housing provision to the town. We consider that The Crown Estate's sites in Blandford Forum and Blandford St. Mary are well placed to assist in housing delivery as part of a sustainable growth strategy. There is sufficient land to meet the full 15 year requirement at Blandford if Policy 20 is deleted.

**WORD COUNT: 2,220**