

THE NORTH DORSET LOCAL PLAN PART 1 2011-2026 (LP1)

ISSUE 4:

MEETING HOUSING NEEDS, INCLUDING AFFORDABLE HOUSING AND THE NEEDS OF GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE (POLICIES 6 TO 10 AND POLICY 26)

ON BEHALF OF MESSRS DRAKE

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- 4.2. NPPF paragraph 47 requires the supply of housing to be boosted significantly. Between 2001 and 2011, 370 dwellings per annum were built in the District. The figure now proposed is 280 dwellings a year. Is the Council's target justified and sufficiently aspirational, in light of past rates of housing provision, including in terms of affordable housing provision? (see also question 4.12 below).
- 4.3. Is the inclusion of North Dorset District within the boundary of the Bournemouth/Poole Housing Market Area (HMA) justified? What are the consequences of the use of the HMA boundary, particularly for the northern part of the District?
- 4.4. Is the Strategic Market Housing Assessment (SHMA) sufficiently up-to-date and does it reflect the guidance on SHMAs in the NPPF (paragraph 159) and Planning Practice Guidance? The 2011 SHMA Update concluded that overall need for housing in the District has reduced from 350 to 280 dwellings per annum since 2008 (paragraph 4.29 of MHN001), the reason given is the economic downturn. However there is evidence that the economy is recovering so can the updated SHMA (2012) be relied upon, bearing in mind the current economic context?
- 4.5. Is the Strategic Housing Land Availability Assessment (SHLAA) sufficiently up-to-date?
- 4.6. Can the Council demonstrate a 5 year supply of housing plus appropriate buffer; and locations for growth for years 6 to 10 and 11 to 15 (NPPF paragraph 47)?
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- 4.8. Is the Council's approach towards taking into account vacancy rates and second homes, in the overall housing figures, reasonable and justified?
- 4.9. Should the contribution that existing commitments and potential windfalls make to overall housing provision over the plan period be clarified?

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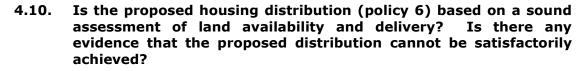
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- 4.11. Is the housing mix proposed in policy 7 justified? Should the reference in paragraph 5.34 be to bedroom numbers rather than size? Does the Council's approach meet the objectives of paragraph 50 of the NPPF, with regard to delivering a wide choice of family homes?
- 4.12. Bearing in mind the SHMA Update (MHN004) concludes in paragraph 5.7 that there is a need to provide an additional 387 units of affordable housing per annum (up to 2016), has the Council placed sufficient weight on meeting the District's affordable housing needs? Will the Council's policies deliver a reasonable amount of affordable housing and in the locations where need is greatest? Is the advice in paragraphs 173 and 174 of the NPPF sufficiently reflected in LP1? What is the justification for seeking a reduced provision in Gillingham?
- 4.13. Is the Affordable Housing threshold justified and would the requirements of policy 8 put at risk the financial viability of any housing schemes? Is the policy sufficiently flexible? Is there any evidence to support making a distinction between town centre and non town centre development? Is the reference to the involvement of the District Valuer appropriate?
- 4.14. Is the affordable rent/intermediate housing split justified and in line with current evidence and is it reasonable for the Council to seek the provision of social rented housing in some circumstances (paragraph 5.105)?
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- 4.20. Is policy 26 on sites for gypsies and travellers clear and consistent with national guidance and does it establish appropriate and reasonable criteria?

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- 4.1. Although not explicitly stated in LP1, I interpret the figure of 4,200 dwellings (280 dwgs a year) as being the Council's objectively assessed housing need for 2011-2026. Is this figure justified bearing in mind it is lower than that proposed in the former Regional Strategy? What has been the role of household projections in estimating overall housing need (see PPG paragraph 015 under Housing and Economic Development Needs Assessments)?
- 4.1.1 The latest Strategic Housing Market Assessment (SHMA) (MHN004) was published January 2012, prior to the publication of the NPPF (March 2012), which introduced the concept of "objectively assessed need" (OAN) and the PPG (March 2014). As such, the evidence base underlying the housing requirement of the Local Plan was not produced in accordance with the NPPF or the PPG and cannot therefore represent the OAN.
- 4.1.2 A similar situation arose at the West Dorset, Weymouth and Portland Local Plan examination, where the Inspector suspended the examination while a NPPF-compliant SHMA was prepared.
- 4.1.3 The NPPF requires that "Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, <u>and that they take full account of relevant market and economic signals</u>"¹. Similarly, the PPG (2a-018) requires that employment growth is considered in the OAN. However, the SHMA Update considers housing in isolation of the economy. The housing requirement of 280 dwellings per annum (dpa) arises solely from household projections as identified in the Housing Background Paper 2013 (MHN001)².
- 4.1.4 The original SHMA (MHN006)³ identifies that 290dpa would support a loss of 1,270 jobs from 2006-16. However, the Supporting Economic Development Background Paper (SED001)⁴ identifies that an additional 4,400 jobs are needed from 2011-26. No change has been made to the housing requirement to support this growth.

¹ My emphasis

² Paragraph 4.31

³ See tables 6.2 and 6.3

⁴ Paragraph 4.8

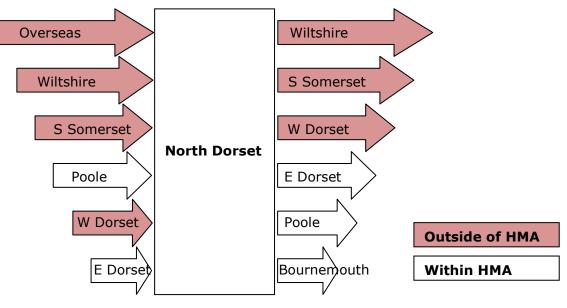
- 4.1.5 INS008⁵ suggests that the latest household projections identify a need for 234dpa and so the housing requirement provides headroom for economic growth. However, the housing requirement is below that required to support a loss of 1,270 jobs according to the Councils evidence, and so will not support the additional 4,400 jobs.
- 4.1.6 The PPG (2a-021) also requires that the needs of specific groups are considered. Whilst elderly households are alluded to in the SHMA Update, no specific analysis is incorporated.
- 4.1.7 These factors were considered in the original SHMA (MHN006) in the context of the delivery of 350dpa as identified in the Regional Spatial Strategy (RSS). However, the Local Plan is now informed by the SHMA Update (MHN004) and no reassessment of these factors has been undertaken in this context.
- 4.1.8 The PPG (2a-019) additionally requires that market signals are considered in order to determine whether any upward adjustment to the projections is required. However, the SHMA Update does not consider market signals but rather relies solely on household projections.
- 4.1.9 The PPG (2a-029) then also identifies 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". The SHMA however, identifies an annual need for 387 affordable homes per annum but does not consider amending the household projection led figure to contribute to these needs.
- 4.1.10 The result is that the 4,200 dwellings cannot represent the OAN as it has not been determined in accordance with the NPPF and the PPG.
- 4.1.11 The housing requirements contained in the RSS, represented the previous Government's assessment of the sustainable distribution of growth at a particular point in time. Whilst these are now out-of-date they still provide a broad indication of sustainable levels of growth. For a plan to be found sound a comprehensive assessment of the OAN, in conformity with the NPPF is required. Such an assessment has not been undertaken in North Dorset.
- 4.1.12 The RSS identified a requirement for 350dpa in North Dorset compared to the 280dpa now proposed by the Local Plan. This suggests that the proposed housing requirement is significantly below sustainable levels of growth.

⁵ Paragraph 2.16 of the Councils response to the Inspectors Question 3

4.1.13 The proposed housing requirement of 280dpa has been solely informed by household projections. The SHMA Update identifies that this has been done "using a combination of updated County Council population/household figure (for 2011) and assumptions underpinning the 2008-based CLG household projections". However, no detail of these projections has been provided, including whether they have been adjusted to reflect local factors as required by the PPG (2a-015). In this context, the use of these projections is not justified notwithstanding the fact that no account has been made of market signals or economic growth.

- 4.2. NPPF paragraph 47 requires the supply of housing to be boosted significantly. Between 2001 and 2011, 370 dwellings per annum were built in the District. The figure now proposed is 280 dwellings a year. Is the Council's target justified and sufficiently aspirational, in light of past rates of housing provision, including in terms of affordable housing provision? (see also question 4.12 below).
- 4.2.1. District-Wide Local Plan contained a housing requirement of 5,900 dwellings (393dpa). The actual completions over the plan period equated to 394dpa. The Council is forecasting a five-year recovery in housing completions from a low point of 144 completions in 2012/13; averaging 412dpa over the next five years and rising to a peak of 543 in 2017/18. The target of 280dpa implies a 40% drop in completions from this peak for the remainder of the plan period. A rate of 280dpa was exceeded in 13 of the 20 years from 1994 and is forecast to be exceeded in 4 of the 5 years from 2014.
- 4.2.2. There is a striking difference between past rates of housing completion in the District, the five-year forecast of future delivery and the proposed housing target of 280dpa in the Local Plan.
- 4.2.3. The housing requirement is therefore clearly in conflict with the significant boost to the supply of housing sought by paragraph 47 of the NPPF and does not provide for positive planning. Such a drop in housing supply is bound to have negative impacts on the affordability of housing and on the supply of affordable housing, whatever the household projections say, in view of the level of pent-up demand that is evidenced by the housing affordability ratio.

- 4.3. Is the inclusion of North Dorset District within the boundary of the Bournemouth/Poole Housing Market Area (HMA) justified? What are the consequences of the use of the HMA boundary, particularly for the northern part of the District?
- 4.3.1. The HMAs were originally derived from the Main Evidence for the Bournemouth/Poole and Dorchester/Weymouth HMAs (June 2008)⁶. This identified 3 HMAs, namely the Bournemouth/Poole HMA, the Dorchester/Weymouth HMA and North/West Dorset.
- 4.3.2. Figure 3.9 of this assessment identifies that approximately half of North Dorset does not lie in the Bournemouth/Poole HMA but within North/West Dorset. The summary states that in North/West Dorset "other towns outside of Dorset have a greater influence on the area". Furthermore, Paragraph 2.12 of the Local Plan identifies that the SHMA Update "recognises that the northern part of the District has only a limited functional relationship with the South East Dorset conurbation".
- 4.3.3. The migration data from the 2011 Census has been made available as presented below.



4.3.4. This demonstrates that the greatest housing interactions are experienced with authorities which are not within the Bournemouth/Poole HMA.

⁶ This is not included in the examination library



4.3.5. Given that the evidence base identifies that much of North Dorset does not lie in the HMA and that the latest evidence indicates that it has much stronger linkages with other authorities, there is little to justify its inclusion in the HMA.

- 4.4. Is the Strategic Market Housing Assessment (SHMA) sufficiently upto-date and does it reflect the guidance on SHMAs in the NPPF (paragraph 159) and Planning Practice Guidance? The 2011 SHMA Update concluded that overall need for housing in the District has reduced from 350 to 280 dwellings per annum since 2008 (paragraph 4.29 of MHN001), the reason given is the economic downturn. However there is evidence that the economy is recovering so can the updated SHMA (2012) be relied upon, bearing in mind the current economic context?
- 4.4.1. The SHMA Update (MHN004) was produced prior to the existence of the NPPF or the PPG and is inconsistent with national policy as identified in the response to Question 4.1.
- 4.4.2. The Housing Background Paper 2013 (MHN001) explains the reduction from the previous housing requirement results from the economic downturn. The projections must therefore take some account of this downturn. However, these projections and their underlying assumptions have not been made available and are therefore not justified.
- 4.4.3. Relying on recessionary trends to inform a housing requirement which will cover a full economic cycle does not reflect positive planning and is inconsistent with the emphasis in the NPPF.

4.5. Is the Strategic Housing Land Availability Assessment (SHLAA) sufficiently up-to-date?

4.5.1. The PPG (3-041) requires that "the assessment of sites should be kept up-to-date as part of the local authorities' monitoring report and should be updated yearly". However, the latest SHLAA for North Dorset was published in August 2011 with a base date of 2010. Although this is not considered a matter of soundness for North Dorset as the SHLAA identifies sufficient sites to provide for almost 13,000 homes as compared to the proposed housing requirement of 4,200, it is nevertheless nearly 5 years old, in which case it cannot be considered to be consistent with the emphasis in the NPPF⁷. The SHLAA should be prepared to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period; it should also be up-to-date in line with paragraph 158.

⁷ Paragraphs 158 and 159

- 4.6. Can the Council demonstrate a 5 year supply of housing plus appropriate buffer; and locations for growth for years 6 to 10 and 11 to 15 (NPPF paragraph 47)?
- 4.6.1. Based on the Annual monitoring Report 2014 (IMP006) the Council identify a6.5 year land supply relative to the proposed housing requirement of 280dpa.
- 4.6.2. However, as addressed throughout this response, the housing requirement is not justified, effective, positively prepared or consistent with national policy.
- 4.6.3. If for example, the OAN was 350dpa (consistent with the annual requirement of the Regional Spatial Strategy), there would only be a 4.8 year land supply (assuming a 5% buffer).
- 4.6.4. The supply would reduce further if a 20% buffer was applied in recognition of the under-supply in 5 of the last 6 years against either the proposed requirement of the Local Plan or the requirement of the RSS. Indeed, if a 20% buffer was applied, there would be a 5.7 year land supply against the proposed housing requirement of 280dpa or a 4.2 year land supply against a housing requirement of 350dpa⁸.
- 4.6.5. The result of this is that if a robust, NPPF-compliant SHMA was undertaken which identified an OAN in excess of 280dpa there is likely to be a requirement to identify further sites and/or to allow sustainable development in rural areas.
- 4.6.6. The developable supply is not clearly set out in the evidence base but the SHLAA identifies sufficient developable sites to provide for up to 13,000 homes over the plan period. Therefore, providing developable sites were considered favourably (including in the larger villages) there would be more than sufficient supply for 10 and 15 years.

⁸ Pegasus Group has not undertaken an assessment of the deliverable supply, and has relied solely on the Council's assessment to reach the above conclusions



4.7. Why is there no housing trajectory included within the plan or a clearly expressed implementation strategy (NPPF paragraph 47)? (see also question 12.1 on monitoring)

4.7.1. This question is most appropriately addressed by the Council.

- 4.8. Is the Council's approach towards taking into account vacancy rates and second homes, in the overall housing figures, reasonable and justified?
- 4.8.1. The SHMA Update (MHN004) identifies that the household projections indicate an additional 273 households per annum and equate this to around 280dpa, once vacancies and second home ownership are taken into account. This is not justified in any way and equates to an assumed occupancy rate⁹ of 97.5%.
- 4.8.2. The 2011 Census identifies that there were 30,397 dwellings in North Dorset accommodating 28,670 households. This equates to an occupancy rate of 94.3%. The application of this justified rate would represent NPPF compliant, positive planning.
- 4.8.3. If the occupancy rate from the 2011 Census was applied to the projected 273 households per annum, this would result in 290dpa, which results in a further 150 dwellings over the 15 year period or 200 dwellings if the plan period was extended to 2031.

⁹ Including an allowance for second homes and vacant homes



- 4.9. Should the contribution that existing commitments and potential windfalls make to overall housing provision over the plan period be clarified?
- 4.9.1. Information on commitments is contained in the SHLAA (MHN007), but this was produced in 2011 (with a base date of 2010) and so is now out-of-date. Paragraph 5.67 of the AMR 2014 provides information on the contribution from windfall sites but no detailed information is provided.
- 4.9.2. This information is required to assess the adequacy of the deliverable and developable land supply situation in terms of satisfying the requirements of the NPPF¹⁰.

¹⁰ Paragraph 47

- 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?
- 4.10.1. The Local Plan proposes at least 230 homes in the countryside. The SHLAA (MHN007) identifies sites within the countryside (including the larger villages and Stalbridge) with a capacity for circa 4,970 homes. However, the Local Plan proposes to removes settlement boundaries, such that delivery can only be forthcoming as rural exceptions, or through Neighbourhood Plans.
- 4.10.2. At present there are no Neighbourhood Plans have been made in North Dorset and rural exceptions sites provide only a minimal (although essential) source of supply. Removing the settlement boundaries will be overly restrictive, effectively resulting in a moratorium on development to meet rural needs.



- 4.11. Is the housing mix proposed in policy 7 justified? Should the reference in paragraph 5.34 be to bedroom numbers rather than size? Does the Council's approach meet the objectives of paragraph 50 of the NPPF, with regard to delivering a wide choice of family homes?
- 4.11.1. Pegasus Group has no comments on this matter.

- 4.12. Bearing in mind the SHMA Update (MHN004) concludes in paragraph 5.7 that there is a need to provide an additional 387 units of affordable housing per annum (up to 2016), has the Council placed sufficient weight on meeting the District's affordable housing needs? Will the Council's policies deliver a reasonable amount of affordable housing and in the locations where need is greatest? Is the advice in paragraphs 173 and 174 of the NPPF sufficiently reflected in LP1? What is the justification for seeking a reduced provision in Gillingham?
- 4.12.1. Several elements are required by the PPG to determine the OAN including assessments of:
 - the demographic led need;
 - the economic led need;
 - the affordable need; and
 - market signals.
- 4.12.2. However, the housing requirement has been determined solely on the basis of the demographic led need. The SHMA (MHN004) does at least establish that there is an affordable need for 387dpa. However, no consideration has been given to meeting this or other needs.
- 4.12.3. The Local Plan proposes a housing requirement of 280dpa with a requirement that between 30% and 40% of housing on sites of 3 or more dwellings is delivered as affordable housing (in Policy 8). Assuming that all development occurred on sites of 3 or more dwellings and that the required rates are achieved on all sites, a maximum of between 84 and 112 affordable homes would be delivered per year, as compared to the need for 387.
- 4.12.4. Furthermore, based on recent completions, an average of 26% of all completions has been affordable. Assuming that this rate is maintained then the Local Plan will only achieve 73 affordable units per annum (or 19% of the need).
- 4.12.5. Whilst there is no quantified affordable need in the countryside, there is a significant affordable need in these areas. The Local Plan allows for rural exception sites which may deliver a limited number of affordable homes (potentially supported by a small amount of market housing), but effectively places a moratorium on all other residential development that would have been acceptable under previous policy, through the removal of settlement boundaries. In so doing, market led affordable housing will not be delivered in these areas which will limit the total number of affordable homes delivered.



4.12.6. The SHLAA (MHN007) identifies sufficient capacity to deliver well in excess of the 4,200 homes proposed in the Local Plan, and the delivery of further sustainable homes would provide for a greater number of affordable homes to respond to the identified need. Whilst the need for affordable homes (387dpa) is unlikely to be met, a significant, sustainable increase would provide for a greater proportion of this need. On this basis alone, a far more aspirational yet realistic housing requirement should be planned for.



- 4.13. Is the Affordable Housing threshold justified and would the requirements of policy 8 put at risk the financial viability of any housing schemes? Is the policy sufficiently flexible? Is there any evidence to support making a distinction between town centre and non town centre development? Is the reference to the involvement of the District Valuer appropriate?
- 4.13.1. Pegasus Group has no comments on this matter.



- 4.14. Is the affordable rent/intermediate housing split justified and in line with current evidence and is it reasonable for the Council to seek the provision of social rented housing in some circumstances (paragraph 5.105)?
- 4.14.1. Pegasus Group has no comments on this matter.

4.15. Are the requirements of policy 9 too restrictive and unduly onerous? How would the Council exercise its discretion regarding the provision of market homes?

- 4.15.1. The removal of settlement boundaries (notwithstanding that they require a review) is considered contrary to the NPPF¹¹, which seeks to promote housing where it will support the vitality of rural communities. Maintaining the settlement boundaries would allow for infill development which would provide accommodation for younger households to remain in their locality; provide greater choice for existing households; and provide greater support for community facilities without compromising the built form.
- 4.15.2. Notwithstanding this, the policy as drafted is overly prescriptive but at the same time imprecise. It allows for rural exceptions within or adjoining the built-up area of Stalbridge and the villages only. However, it fails to define what it means by the "built-up area" having removed the settlement boundaries. It then goes on to identify a list of criteria against which rural exception sites will be assessed. The result of this is that very little housing is likely to be identified outside of the 4 main settlements, until Neighbourhood Plans are made (which is far from certain and will not happen across the entirety of the area) or Part 2 of the Local Plan is progressed in 2016. In effect, this places a moratorium on all housing developments in the countryside until Part 2 is adopted. This is directly in conflict with the NPPF which requires a significant boost to the supply of affordable and market housing.

¹¹ Paragraph 55



4.16. How do the Council define "in-filling" (policy 7)?

4.16.1. This question is most appropriately addressed by the Council.



- 4.17.1. The needs of specific groups, including the elderly and those with special needs, are commented upon in the original SHMA (MHN006). However, the needs are not quantified in any way and as such no allowance is made for the delivery of homes to meet these needs. Once a robust, NPPF compliant assessment of the OAN is in place, this may identify that an additional allowance is required to meet the needs of specific groups.
- 4.17.2. The SHMA Update (MHN004) does not provide any further detail.
- 4.17.3. Policy 7 seeks to support specialist housing where this is proposed. This approach does not directly address the unidentified levels of need that may exist and so is ineffective.

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4.18. Is the Council providing sufficient support for people wishing to build their own homes?

- 4.18.1. Paragraph 159 of the NPPF requires that the SHMA should address the needs for people looking to build their own homes. Similarly, the PPG (2a-021) details how such an assessment should be undertaken. However, none of the SHMA documents in North Dorset have undertaken any assessment of the demand for self-build sites.
- 4.18.2. Rather the Local Plan suggests (paragraphs 5.56 and 5.57) that there will be opportunities for self-build on infill sites within the settlement boundaries, by converting existing buildings or through neighbourhood plans without the need for any assessment of the scale of demand. However, the settlement boundaries have been removed for the majority of settlements and neighbourhood plans will not cover the whole area (if they come forward at all). In this context, there is no certainty that there will be opportunities for self-build, unless a suitable existing building is to be converted. With this limited supply and no assessment of the identified demand, the Policy does not provide for effective or positive planning, is not justified and is not consistent with the NPPF.

- 4.19. Has the Council satisfactorily considered the relationship between housing provision and employment trends (PPG paragraph 018 under Housing and Economic Development Needs Assessments)?
- 4.19.1. As previously identified, there has been no consideration of employment trends (or affordable needs or market signals). Rather the housing requirement relies solely on demographic led household projections.
- 4.19.2. The proposed 280dpa is based on trend-based data, as identified in the Housing Background Paper 2013 (MHN001)¹². However, the SHMA Update (MHN004)¹³ then identifies that "if current trends continue then the number of people in key working age bands (i.e. those aged 16-64) is likely to decline which may potentially generate a labour shortage when looking 20 years ahead. This may act as a barrier to economic growth in the District and more widely across Dorset".
- 4.19.3. This demonstrates that the proposed housing requirement has not considered and does not support economic growth as confirmed in INS008¹⁴. In this regard the Local Plan is not effective; does not provide for positive planning; and is inconsistent with the NPPF.

¹² Paragraph 4.31

¹³ Paragraph 6.12

¹⁴ Paragraph 2.17 of the Councils response to the Inspectors Question 3



- 4.20. Is policy 26 on sites for gypsies and travellers clear and consistent with national guidance and does it establish appropriate and reasonable criteria?
- 4.20.1. Pegasus Group has no comments on this matter.



4.21. Summary

What part of LP1 is unsound?

4.21.1. The housing requirement set out in Policy 6; The Housing Needs of Particular Groups set out in Policy 7; The Countryside and Settlement Boundaries set out in Policy 2 and Rural Exceptions set out in Policy 9.

Which soundness criterion it fails?

- 4.21.2. The housing requirement is not effective; is not justified; is not positively prepared; and is not consistent with national policy.
- 4.21.3. The Housing Needs of Particular Groups is not effective; is not justified; and is not consistent with national policy.
- 4.21.4. The Countryside and Settlement Boundaries and Rural Exceptions are not effective; are not positively prepared; and are not consistent with national policy.

Why it fails?

- 4.21.5. The housing requirement is based on a SHMA which is inconsistent with the NPPF (and PPG), as it fails to consider affordable needs; economic needs; the needs of particular groups; and market signals, being based solely on household projections. The assumptions underlying these household projections are not available and so are not justified. Additionally the allowance for vacant and second homes is not justified in any way. These failings result in a housing requirement that is not representative of the OAN and does not provide for a significant boost to supply, and therefore the housing requirement is not effective or positively prepared to meet the needs of the population over the plan period.
- 4.21.6. The Housing Needs of Particular Groups is again based on the SHMA which is inconsistent with the NPPF (and PPG). Indeed, no quantitative assessment has been made of any particular group and furthermore no assessment whatsoever has been undertaken of some groups (including for self-build). This lack of a quantitative assessment means that the policy is not justified. Without this assessment of need or an assessment of the capacity Policy 7 cannot be seen to be effective, especially in the context of an effective short-term moratorium on housing development outside of all but 4 settlements.
- 4.21.7. The Countryside and Settlement Boundaries and Rural Exceptions in effect place a short-term moratorium on housing development outside of the 4 settlements. The Policy allows for development to come forward through rural



exceptions sites, with a policy which is so prescriptive that development will be limited at best, and through neighbourhood plans, which cannot be relied upon. The Policy is therefore not effective in addressing rural needs or positively prepared. This effective moratorium is also contrary to the NPPF requirement for a significant boost to supply.

How LP1 can be made sound?

- 4.21.8. The Local Plan can be made sound with three amendments.
- 4.21.9. Firstly, an NPPF compliant SHMA which identifies the OAN and the needs of particular groups should be produced and the findings translated into the Local Plan. An updated assessment is imminent; an Interim version has been available to other districts currently consulting on their Local Plans.
- 4.21.10. Secondly, the reinstatement of all settlement boundaries including a review of these boundaries would ensure that the Local Plan was effective in meeting rural needs.
- 4.21.11. Thirdly, the Rural Exceptions policy should be revised to be less prescriptive.

The precise change and/or wording that you are seeking?

4.21.12. The recommended changes to the policy wording (not including supporting text) are included as Appendix 1.

APPENDIX 1: RECOMMENDED CHANGES TO POLICY WORDING



APPENDIX 1

POLICY 2: CORE SPATIAL STRATEGY

All development proposals should be located in accordance with the spatial strategy for North Dorset.

The Four Main Towns

Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton are identified as the 'main towns' in North Dorset. They will function as the main service centres in the District and will be the main focus for growth, both for the vast majority of housing and other development.

Policies 16 to 19 set out the main locations for growth at the four main towns, which will be shown in more detail in Part 2 of the Local Plan that deals with site allocations, with the exception of the southern extension to Gillingham, which is identified as a strategic site allocation in Policy 21 of this document.

The Countryside (including Stalbridge and the Villages)

Outside the defined boundaries of the four main towns, the remainder of the District (including Stalbridge and all the District's villages) will be subject to countryside policies where development will be strictly controlled unless it is required to enable essential rural needs to be met.

In addition to countryside policies, a**A**t Stalbridge and all the District's villages, the focus will be on meeting local (rather than strategic) needs, which will be delivered primarily through neighbourhood planning. Communities in Stalbridge and all the District's villages will be able to 'opt in' to the site allocations in Part 2 of the Local Plan, as an alternative to meeting local and essential rural needs through countryside policies and neighbourhood planning.

Settlement Boundaries

The settlement boundaries defined around the four main towns in the North Dorset Districtwide Local Plan 2003 have been reviewed however further reviews can be undertaken through neighbourhood plans are retained and will continue to be used for development management purposes until reviewed either: through site allocations in Part 2 of the Local Plan or a neighbourhood plan. The settlement boundaries defined around all other settlements in the North Dorset Districtwide Local Plan 2003 are removed and these settlements will be subject to countryside policies unless new settlement boundaries are defined in neighbourhood plans or site allocations in Part 2 of the Local Plan.

POLICY 6: HOUSING DISTRIBUTION

At least 4,200 [replace with a figure from a NPPF compliant SHMA] net additional homes will be provided in North Dorset between 2011 and 2026 2031 at an average annual rate of about 280 [replace with a figure from a NPPF compliant SHMA] 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 - 2026 will be as follows:

a Blandford (Forum and St. Mary) – about 960 [replace with a figure from a NPPF compliant SHMA] homes;

b Gillingham – about 1,490 [replace with a figure from a NPPF compliant SHMA] homes;

c Shaftesbury – about 1,140 [replace with a figure from a NPPF compliant SHMA] homes;

d Sturminster Newton – about 380 *[replace with a figure from a NPPF compliant SHMA]* homes.

The approximate scale of affordable housing development that will be sought at the four main towns during the period 2011 - 2026 will be as follows:

e Blandford (Forum and St. Mary) – about 380 [*replace with a figure from a NPPF compliant SHMA*] affordable homes;

f Gillingham – about 500 [replace with a figure from a NPPF compliant SHMA] affordable homes;

g Shaftesbury – about 450 [replace with a figure from a NPPF compliant SHMA] affordable homes;

h Sturminster Newton – about 150 *[replace with a figure from a NPPF compliant SHMA]* affordable homes.

In the countryside (including Stalbridge and the villages) the level of housing and affordable housing provision will be the cumulative number of new homes delivered to contribute towards meeting identified local and essential rural needs. A minimum of 230 *[replace with*

a figure from a NPPF compliant SHMA] dwellings will be provided in the countryside (including Stalbridge and the villages) during the period 2011 – 2026 2031.



POLICY 7: DELIVERING HOMES

Housing Mix

All housing should contribute towards the creation of mixed and balanced communities.

In the period to 2026 2031, the Council will seek to deliver 40% of market housing in North Dorset as one or two bedroom properties and 60% of market housing as three or more bedroom properties, with an emphasis on the provision of two and three bedroom properties.

In the period to 2026, the Council will seek to deliver 60% of affordable housing in North Dorset as one or two bedroom properties and 40% of affordable housing as three or more bedroom properties.

These proportions will be the starting point for negotiations on the mix of house sizes on all sites where 10 or more dwellings are proposed, although a different mix may be permitted if it can be soundly justified by local circumstances. On sites of less than 10 dwellings, a mix of house sizes appropriate to each specific site will be sought, although in the case of rural exception sites, the mix should reflect identified local needs in accordance with Policy 9 – Rural Exception Affordable Housing.

The Housing Needs of Particular Groups

The Council will seek to meet the needs of different groups in the community both through the provision of a suitable mix of market and affordable house sizes and by working with partners, including Registered Social Landlords and Dorset County Council.

The Council will support the provision of age-restricted housing for the elderly and will usually seek to control its occupancy by planning condition or planning obligation.

[Review to consider whether specific allocations need to be made in order to respond to specific needs identified through a NPPF-compliant SHMA]

Residential Density

The design and layout of any development with a housing element should seek to achieve a residential density that:

a makes effective use of the site; and

b respects the character and distinctiveness of the locality; and

c is acceptable in terms of design and amenity, both for the intended occupants of the new development and the occupants of existing development in the vicinity.

High density housing development (above 50 dwellings per hectare) is only likely to be acceptable:

d in town centres; or

e in areas outside town centres, which offer opportunities for walking, cycling and the use of public transport to access key locations and essential facilities; or

f in other locations that have already been developed at a high density.

Infilling and Residential Gardens

Any infilling that takes place within the settlement boundaries of Blandford, Gillingham, Shaftesbury and Sturminster Newton, including on residential gardens, should be sensitively designed to its local context and respect the amenity of adjoining properties.



In the event that a settlement boundary is established for Stalbridge or any of the District's villages in a neighbourhood plan, any infilling, including on residential gardens, should be sensitively designed to its local context and respect the amenity of adjoining properties. Where settlement boundaries exist, or are created or modified in neighbourhood plans, local communities are encouraged to develop more detailed policies relating to infilling.

POLICY 9: RURAL EXCEPTION AFFORDABLE HOUSING

Rural exception affordable housing schemes will only be permitted within or adjoining the built-up area of Stalbridge or the District's villages. Rural exception affordable housing schemes will not be permitted within or adjoining the settlements of Blandford (Forum and St. Mary), Gillingham, Shaftesbury and Sturminster Newton.

Rural exception affordable housing schemes (including schemes that propose small numbers of a market housing units) will only be permitted subject to the following criteria:if a local need for rural exception affordable housing can be demonstrated in an appropriate up-to-date local needs survey.

Where an appropriate up-to-date local needs survey for a parish (or group of parishes) identifies a local need, a rural exception affordable housing site should be sought, in the first instance, at the most sustainable settlement in that parish (or group parishes) in terms of population, facilities and accessibility.

When searching for a rural exception site at a settlement, a rural exception affordable housing site should be sought, in the first instance, on a site with a capacity for no more than nine dwellings in total (including both affordable and market elements) within the existing built up area of the settlement. Where no such suitable site exists within the relevant settlement a scheme should be provided on a site with a capacity for no more than nine dwellings in total (including both affordable and market elements) adjoining the existing built up area of the settlement.

A rural exceptions housing scheme will only be permitted if:

a the number of proposed affordable homes does not exceed the identified local affordable housing need identified in an appropriate up-to-date survey; and

b all the proposed affordable homes are of a size, type and form (or mix of forms) of tenure that will meet, or contribute towards meeting, the identified local affordable housing need identified in an appropriate up-to-date survey.

At the Council's discretion, a small number of market homes, which should not exceed one third of the total number of homes being proposed (including the affordable and market elements) may be permitted on a rural exception site, as part of a rural exception affordable housing scheme.

Such small numbers will only be permitted if it can be demonstrated to the Council by way of an open book viability assessment that:

c having examined all other potential sources of funding, it would not be possible to provide the affordable homes on the site without a market element; and

d the market homes are required to contribute towards closing a funding gap for the provision of the rural exception affordable homes on that scheme; and

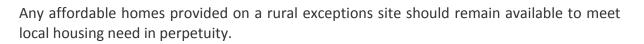
e the number of market homes proposed is the minimum necessary to deliver the affordable element of the scheme in a manner that addresses the affordable housing needs of the local community.

If the Council accepts that a market housing element is required on a rural exception affordable housing scheme, the scheme will only be permitted if:

f no market home is larger than the largest affordable home on the site; and

g no market home exceeds the size of comparable types of affordable housing that is being provided on the site; and

h the market homes are integrated with the affordable homes to form a single housing scheme.



Pegasus Group