

## **Councils' response to points made in Goadsby Planning & Environment's response statement to Christchurch and East Dorset SHLAA 2012**

### **Strategic Housing Targets.**

Table 1 of Goadsby's statement correctly identifies 995 units in Christchurch and 2,405 in East Dorset for the urban extensions / new neighbourhood category. Policy KS3 of the Core Strategy proposes a joint target for Christchurch and East Dorset of 4,800 homes within the existing urban areas and 3,400 at new neighbourhoods.

Table 1 (Strategic Housing Targets) of Goadsby's statement refers to targets of 2,140 for Christchurch and 2,660 for East Dorset for the period 2013 – 2028. The origin of the 2,660 figure is unclear. Paragraph 4.19 of the Core Strategy states that there is a capacity to build approximately 2,140 new homes in Christchurch urban area and 2,880 in East Dorset.

Paragraph 1.3 of Goadsby's statement refers to annual delivery targets of 209 in Christchurch and 338 in East Dorset. Policy KS3 identifies a joint target of 8,200 homes between 2013 – 2028 which equates to an annual target of 547 a year. It is not clear how the split between each authority has been calculated and there is no reference to the source of this information.

### **Comparison with completions rates**

Table 2 of Goadsby's statement identifies past completion rates which have fallen since 2007/8. It is recognised that the rate of completions in the past 5 years has fallen but this has to be seen within the context of a national economic recession and the completion of sites allocated in the previous Local Plans. The Christchurch and East Dorset Housing Trajectory sets out the predicted annual delivery of housing. This shows that over the full 15 years it is predicted that the proposed housing target will be exceeded.

### **Previously Developed Land**

Paragraph 1.6 – reliance on use of PDL in Christchurch. Percentages calculated from Table 1. Nothing to comment on this – agree that PDL remains an important element of supply for Christchurch.

## **2.0 Supply in the context of environmental constraints**

Paragraph 2.2/3 of Goadsby's statement comments that historic completions up to 2010 in Table 2 may include sites that obtained planning permission before restrictions were introduced by the 2006 Dorset Heathlands Interim Planning Policy.

It is contended that the 400m buffer zone covers a relatively small proportion of the urban area of Christchurch in parts of Jumpers and St Catherines Hill residential areas. It is estimated that numbers of residential units granted planning permission in this area before the buffer zone came into operation would not constitute a significant proportion of total permissions for the Borough.

The 400m buffer zone affects a larger proportion of East Dorset, but due to the length of time the policy has been in operation, it is unlikely that a significant number of valid consents still remain that would have an impact on residential numbers in the District.

### **3.0 Viability**

Paragraph 3.2 of Goadsby's statement refers to paragraph 173 of the NPPF regarding viability assessments. However this is in relation to sites for development identified in the Local Plan, not the SHLAA. The SHLAA is not a document which allocates sites for development, not gives them planning status.

Paragraph 3.3 of Goadsby's statement states that two emerging policies should be factored into the SHLAA – impending introduction of CIL and change to the affordable housing policy.

It is contended that the impact of these emerging policies have been tested outside the SHLAA through viability assessments. The Three Dragons Viability Study 2010 tested development viability and affordable housing policy. It also factored in contributions from heathland and transport together with other contributions for Lifetime Homes and Code for Sustainable Development. It concluded that it is possible to reduce the threshold to zero, although accepting that some small sites may not be viable. The Three Dragons viability study was undertaken during 2009/10 at a market low, so has relevance to current economic circumstances.

The Peter Brett CIL viability research undertaken in 2013 has tested the impact of CIL and affordable housing on a range of developments including small sites within the urban area. It concluded that many developments would still be viable whilst providing affordable housing and meeting proposed CIL requirements.

High level development assessments for seven neighbourhoods in East Dorset by Whiteleaf Consulting 2013 tested the viability of sites with affordable housing and CIL.

Paragraphs 3.15 – 3.17 of Goadsby's statement refer to one particular source of supply – sub-division, re-development or intensification of existing housing areas which forms a significant element of overall supply. Concern is expressed over the viability of these particular sites.

Research from the Three Dragons Affordable Housing Provision and Developer Contributions in Dorset: Christchurch and East Dorset Reports 2010 on past planning permissions 2005/6 - 2007/8 indicated that there was a heavy reliance on permissions on small sites, with 29 % in Christchurch and 48 % in East Dorset of dwellings permitted on small sites of 1 – 4 and 14 % in Christchurch and 17% in East Dorset on sites of 5 – 9 units.

This research has been updated to identify the percentage of dwellings granted planning permission on small sites between the years 2008/9 – 2012/13. Table 1 shows that in Christchurch the percentage of dwellings on permissions on sites of 1 – 4 has remained at 29% and there is still a significant proportion on sites of 5 – 9 at

24%. In East Dorset the proportion of dwellings granted on small sites appears to have fallen, although this figure is skewed by two planning applications, one for 89 units and one for 186, which represent a significant proportion of the total number of dwellings granted consent between 2008 and the present day. When the number of planning applications for a net increase in dwellings is considered, applications on sites of between 1- 4 units make up 79% of the total number of applications between 2008 and the present day and those of between 5 and 9 make up a further 13%.

This indicates the continuing importance of small sites to the land supply in Christchurch and East Dorset.

**Table 1: Percentage of dwellings on different sizes of sites - for 3 years of permissions – 2005/6 – 2007/8 and the last 5 years of permissions 2008/9 – 2012/13**

Site Size (dwellings)	Total number of dwellings granted planning permission in Christchurch		Total number of dwellings granted permission in East Dorset (net)	
	2005/6 – 2007/8	2008/9 – 2012/13	2005/6 – 2007/8	2008/9 – 2012/13
1 - 4	29%	29%	48%	29%
5 – 9	14%	24%	17%	21%
10 – 14	12%	12%	22%	10%
15 – 24	7%	12%	0%	2%
25 – 49	17%	23%	13%	8%
50 – 99	21%	0%	0%	10%
100 +	0%	0%	0%	20%
Total	100%	100%	100%	100%

Paragraph 3.18 of Goadsby’s statement makes a general comment that site re-development is only really achievable where one property is demolished and replaced with at least 3 of equivalent value.

Research has indicated that there are a number of recent planning permissions in Christchurch for the demolition of 1 property and replacement with 2 dwellings. These examples are identified in Table 2 and are from various locations within the Borough. Three of the sites were completed in Jan / Feb 2011.

<b>Examples in Christchurch of planning permissions for demolition of 1 dwelling and replacement of 2</b>			
<b>Application No. &amp; Address</b>	<b>Development</b>	<b>Decision</b>	<b>Progress</b>
8/08/0220 35 Hurn Way	Demolition of existing bungalow and erection of 2 chalet bungalows	Granted 10.7.08	Completed Jan 2011

8/09/0389 184 Stony Lane	Erect 2 x 3 bedroom detached chalet bungalows after demolition of existing property	Granted 17.12.09	Completed Feb 2011
8/10/0147 13 Priors Close	Erection of 2 detached 2 bed bungalows following demolition of existing	Granted 1.7.10	Completed Feb 2011
8/11/0281 11 Avon Run Close	Erection of 2 x 4 bed detached properties following demolition of existing	Granted 27.10.11	Not commenced
8/11/0179 15 Firshill	Erection of 2 x 3 bed chalet bungalows following demolition of existing	Granted 11.5.12	Not commenced
8/11/0554 15 Rothesay Drive	Erection of 2 x 4 bed chalet bungalows following demolition of existing property	Appeal allowed 17.9.12	Not commenced

In East Dorset the situation is similar. There continue to be applications for 2 for 1 replacements across the whole of the main urban area, including ones granted on appeal, and the schemes are completed. Details of the applications are available if required.

At the end of paragraph 3.17 of Goadsby's statement reference is made to the fact that all of the SHLAA sites within the urban area of Christchurch have been assessed by officers and none have been submitted by landowners and that somehow this is a further weakness of the SHLAA. The Councils do not agree with this statement. In an area with clear planning policies which seek to guide development within the settlements, why would a landowner submit a site through the theoretical SHLAA process when they can so easily submit a planning application which will give them the certainty (or not) that their site has development potential.

#### **4.0 The development of garden land**

Our SHLAAs have considered amendments to national policy which changed the definition of brownfield land to exclude residential gardens. These changes have not had any major implications for the SHLAAs. Some development in garden areas may be an appropriate means of achieving new housing development. The assessment has taken into account existing and emerging design policy and evidence in the Borough of Christchurch Character Assessment and the East Dorset Special Character Areas and existing and proposed policy.

The extant Borough of Christchurch Local Plan, East Dorset Local Plan and the emerging Joint Core Strategy all contain policies which seeks to ensure that the quality of development within the Plan area is of a high quality and harmonise with the character of the area (Policy H12 of the Borough of Christchurch Local Pan, Policy DES8 in the existing East Dorset Local Plan and HE2 in the emerging Core

Strategy). All applications for residential development will be judged against this aim, and Inspectors have judged that the extant policy is sufficient to ensure that development considered inappropriate in the NPPF is resisted. For example an appeal was allowed in February of this year (Appeal ref APP/U1240/A/12/2183008) to sever part of a garden in Ashley Heath and construct a bungalow. In para 9 of his decision letter, the inspector comments that: 'Local residents object to the principle of the loss of garden land. The appeal site is currently a garden which does not fall within the definition of previously developed land set out in the National Planning Policy Framework.... Nevertheless, it is within an established residential area and the Council has not identified any policy objection to the principle of the scheme. In this case the use of garden land would not be harmful to the character of the area, for the reasons given above.'

It is considered that these strong policy bases are sufficient to enable local discretion to resist inappropriate development in back gardens.

## **5.0 The implementation rate of planning permissions**

Paragraph 4.20 of the Core Strategy, which referred to the SHLAA reports taking into account a discounting rate for the non-implementation of planning permissions in the existing urban area, was deleted in the Schedule of Proposed Changes as the Christchurch SHLAA does not apply a discounting rate.

It is contended that there is no need to have a reduction in the SHLAA for non-implementation as the assessment is of a potential supply of sites that may come forward. An allowance for potential non-delivery of some proposals has already been factored into the joint target for housing delivery as set out in Policy KS3 of the Core Strategy of 8,200. This is explained in paragraph 4.18 of the Core Strategy.

## **6.0 The recent change to the Use Classes Order**

This change occurred after the publication of the SHLAA reports. It is agreed that this could be another source of potential for housing and this will be factored into subsequent SHLAA reviews.

## **7.0 Additional Comments**

**Paragraph 7.1** – Previous SHLAA's assessed against separate targets, and Christchurch did not meet a five year land supply. However, advice from the Planning Inspectorate is that we should set one housing target for the whole plan area. Policy KS3 identifies a single housing target for Christchurch and East Dorset. A five year housing land supply has been calculated for the plan area as a whole. The SHLAA 2012 assessments identify sufficient land within Christchurch and East Dorset to meet a 5 year requirement in terms of the proposed housing delivery strategy in Policy KS3.

**Paragraph 7.2** Christchurch SHLAA Ref 8/11/0525 - Site adj final phase of Hoburne development. Part of this site is allocated as open space. Discussions with the applicant have taken into account Policy for protected open space and have

addressed the issue of providing appropriate on-site open space to contribute to meeting the needs of the Local Needs Area.

### **Paragraphs 7.2 / 7.3 Christchurch SHLAA sites**

Site 8/11/0287 part of Hoburne Caravan Park – preliminary discussions have been held with the landowner and although at an early stage, it is reasonable to include 200 units within the 6 – 15 year supply.

Site 8/03/0293 Cobbs caravan park, Highcliffe – There have been pre-application discussions on this site and an application is expected soon. This site could be moved to the 5 year supply category in the SHLAA when it is reviewed next year. Planning policy re loss of tourism accommodation will be considered at planning application stage.

### **Paragraph 7.4 Car Dealerships**

Paragraph 7.4 of Goadsby's statement asserts that the re-development of car dealership sites for residential is considered highly unlikely.

8/11/0286 Seawards Autocentre, Grange Road. An application was submitted in 2013 for mixed residential / business use (14 dwellings, 17 businesses).

8/11/0196 Keith Motors / KFC Lyndhurst Road

No residential applications, but it is an isolated employment site surrounded by residential uses.

There is a local example of residential re-development of a car dealership site at Tuckton, Bournemouth, which is just over the border with Christchurch. Penton Motors have re-located to a larger site in Christchurch and the site has been redeveloped for housing and a community centre. The site is under construction.

### **Paragraph 7.5 – Sites suddenly added to the SHLAA**

It is contended that 400 units have not suddenly been added to the 2012 Christchurch SHLAA. All the sites referred to in section 7 of Goadsby's statement were first included in the 2011 SHLAA Review, when there was also a call for sites. The SHLAA 2011 draft was circulated to SHLAA panel members for comments.

### **Paragraph 7.6 Lapsed Consents**

Previous Christchurch 5 year supply assessments have included lapsed consents within the 5 year housing land supply and this approach was maintained for consistency in the 2012 SHLAA.

Research has calculated that lapsed consents account for 30 units within the 1 – 5 year category of the 2012 Christchurch SHLAA. For future revisions of the SHLAA a consistent approach across both districts will be undertaken, and lapsed consents can be moved into the 6 – 15 year category if required.

## **Paragraph 7.7 Second Homes**

Further work is not required on this issue as information on second homes from the 2011 Census is included in the Christchurch AMR 2011/12, and in the corresponding East Dorset AMR.

## **8.0 Conclusion**

In accordance with the NPPF, Core Strategy policies KS3 and KS4 will be amended to provide a single policy and housing figure for the plan area which will also provide a 5% buffer to the 5 year housing land supply and enable a 5 year housing supply to be demonstrated across the district and borough.

Taking into account sites identified in the SHLAA and the number of dwellings proposed on greenfield sites within the Core Strategy, the council considers it has an adequate supply to meet this target

The Councils are satisfied that their SHLAA Reports represent a robust assessment of the development potential within the existing urban areas of both Local Authorities within the constraints of the SHLAA Methodology and NPPF guidance. The assessments have been based on recent examples of the range and type of development which have been undertaken across both areas.

Evidence provided in this Response indicates that the majority of development in both areas continues to come from small sites, a number of which are re-developments of existing properties, and there is no reason to consider that this trend will not continue into the future. The Councils' Housing and Affordable Housing SPD (which is currently out to consultation) makes it very clear that the Authorities are alive to the viability concerns needed to bring forward both open market and affordable housing to meet a quantified need and will work hard to ensure that schemes within the area remain viable, but where possible, contribute towards CIL and affordable housing.