

NORTH DORSET LOCAL PLAN PART 1  
EXAMINATION

**CONSULTEE ID – 2961 & 3085**

REPRESENTATIONS TO MID-HEARING  
EXPLANATORY NOTES

ISSUE 4: MEETING HOUSING NEEDS, INCLUDING  
AFFORDABLE HOUSING

MAY 2015



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## CONSULTEE ID – 2961 & 3085

### ISSUE 4: HOUSING NEEDS

Document References MHD003, MHD008, MHD009 and MHD010

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#### **MHD003 – Housing trajectory; and MHD008 – Note: Considering the additional contribution care homes can make to housing supply and showing changes to the housing trajectory**

The provision of a detailed trajectory is welcomed in order to better understand the summary provided in LP1 (Table 4.1). From a review of the trajectory and the supporting note MHD008, we have significant concerns regarding the deliverability of sites and the lack of rigor in the Council's five year housing land supply. Specifically, we wish to comment as follows:

In relation to care homes, paragraph 3.3 states such sites "*will be added to the housing supply when they have had pre-application discussions or when a site has planning permission*". Sites should only be considered to contribute to the housing land supply for the district once planning permission has been granted (or if specifically allocated for development), as set out in planning practice guidance (ref. 3-031-20140306). Sites which have been subject to pre-application discussions should not automatically be considered in the five year housing supply.

Paragraph 3.5 states that following the hearing sessions and discussions with Dorset County Council, a new care home facility is being proposed in Gillingham. The facility is expected to provide 50 units and has been included in the housing trajectory in years 2017/18 and 2018/19 – i.e. the five year supply.

Planning practice guidance (ref. 3-031-20140306) is clear that local planning authorities need to provide robust, up to date evidence to support the deliverability of sites, to ensure that their judgements on deliverability are clearly and transparently set out. No information has been provided for this site in accordance with this guidance, including its origin, whether there is funding available and a potential operator in place.

As only "*recent discussions*" have been held in relation to the site, its inclusion in the trajectory within the first five years of the plan is considered entirely unrealistic and fails to take account of time required for site acquisition and securing planning permission. This site should not be included within the first five years of the trajectory.

Paragraph 4.8 refers to the Brewery Site in Blandford, and confirms that dwelling completions are likely to be delayed until 2018/19. This

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demonstrates that the Council has not effectively considered the lead in time required to commence development on site and build out rates, and further reiterates that their five year housing supply is not robust.

In the revised housing trajectory shown at section 5, a number of units are shown to be delivered in 2015/16 on sites within the Gillingham Southern Extension. Again, this is considered unrealistic and does not appear to correspond with the detailed trajectory (MHD003) which includes first delivery at Lodden Lakes in 2017/18.

It is notable that the trajectory (MHD003) appears to have disregarded the comments made by the South Gillingham Consortium in their Hearing Statement which set out their anticipated delivery rates across the plan period. From 2018, the suggested delivery levels of 100-120 dpa on four sites across the area, with four separate house builders providing 25-30dpa each. The trajectory (MHD003) suggests a delivery of circa 140 dwellings per year from the years 2020/21 to 2026/27. With only a small number of developers involved, together with other infrastructure constraints, this is very unlikely to be deliverable.

As set out in our previous representations, we have seen no evidence of an equalisation agreement between the various landowners involved in the southern extension and without which it cannot be expected that the southern extension will be delivered promptly. Even if the plan period is extended, we do not believe a single strategic site will deliver housing at the rate required to meet the stated need to 2031.

Due to the intention to not allocate other sites and the reliance on land within the settlement boundary to deliver the remaining homes, there is no suitable fall-back position should the southern extension not deliver the required number of homes. Our view remains that a better informed view is required and that a more realistic approach would be to continue to support the southern extension for longer term growth at Gillingham, but at a more realistic rate, whilst allocating other suitable sites around the boundaries of the town to meet shorter term housing needs.

In general, the proposed level of delivery in the years 2016/17 to 2020/21 is overly optimistic and is not an accurate reflection of likely annual delivery rates. For example in Shaftesbury, land adjacent to Wincombe Business Park is shown to provide 50 dpa between 2017/18 and 2019/20 and land off Littledown is proposed to deliver 60 dwellings in 2018/19 and 2019/20. It is plain that this level of delivery is unrealistic on sites which are likely to involve a single developer.

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## **MHD009 - Note on: The delivery of affordable housing**

At the Examination Hearings, concern was expressed in relation to the level of affordable housing proposed in LP1, and clarification was sought from the Council as to how they had considered opportunities to deliver affordable housing in accordance with the Framework and planning practice guidance.

The note provided does not offer additional information to justify the Council's approach to the delivery of affordable housing. Rather, the Council has reiterated points made previously to justify their existing position. We therefore remain of the view that the Council has failed to place sufficient weight on meeting identified affordable housing needs.

In the Schedule of Further Proposed Changes (March 2015), the Council has suggested a reduction in the proposed number of affordable dwellings to be delivered (from 1,480 to 1,150 units across the period 2011 – 2026). MHD009 refers to the earlier figure of 1,480 affordable dwellings to be delivered across the period to 2026 (paragraph 3.5). Whilst it is therefore not made clear by the Council, we assume that the reference to 1,480 dwellings reflects the proposed extension to the plan period to 2031 as a proportion of the proposed revised housing requirement of 5,700 across this period (as set out in paragraph 3.3 of MHD006).

The Council have failed to correlate their identified need with their projections of assessed need, since the annual identified need for additional affordable housing per annum (387 dpa) exceeds the total level of housing proposed (285 dpa). This is curious, and has still not been appropriately justified by the Council.

Paragraph 3.2 of MHD009 states that the 2012 SHMA Update (MHN004) highlights the important role of the private rental sector in meeting affordable housing need, and that *"if attempts were made to provide all of the 387 affordable dwellings required per annum, there would be significant problems with the wider housing market as significant numbers of existing private tenants move to affordable housing"*. The Council should make it clear that the SHMA refers to benefit supported lettings within the private rental sector (paragraph 5.3). It is not clear why the Council consider that the private rental sector plays such an important role and that potentially freeing up some of these units would create 'significant problems' in the wider housing market.

It is notable that paragraph 5.9 of the 2012 SHMA recognises that the private rental sector is not the solution to the clear need and affordability problem in the District and that generally the private rental sector *"does not provide the same level of security of affordable housing whilst the physical condition of properties in this sector is worse"*. This reaffirms that this sector should not be relied on as a way of meeting affordable housing needs.

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Paragraph 3.5 of the note recognises that the four main towns are the largest centres of population and are therefore likely to be the locations where the greatest affordable housing need will arise. Identifying additional sites at these towns will therefore help to meet affordable housing need.

Paragraph 3.6 provides some limited commentary regarding the approach to the delivery of housing in rural areas, through exception sites, neighbourhood plans or via the 'opt in' to LP2. The paragraph states that this "*may include affordable housing to meet need or to deliver community aspirations*". This does not constitute a robust approach to the delivery of affordable homes in the rural area. Paragraph 54 of the Framework is clear that local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites. The Council's plainly are not taking a positive approach to delivery of affordable housing and have not clearly identified and sought to meet rural affordable housing needs in accordance paragraph 54 of the Framework.

Planning practice guidance (ref. 2a-029-20140306) 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"*.

Paragraph 3.7 of MHD009 appears to make reference to this guidance, but states that "*the latest research carried out for the Council concludes that it is clear that an increase in overall provision is not the solution to meeting affordable needs in the District*". The Council are not transparent in what this 'latest research' is, and provide no further explanation as to why an increase in overall housing provision should not be considered in order to help meet identified affordable housing need.

As recognised in the above referenced section of the guidance, the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable developments, given the probable percentage of affordable housing to be delivered by market housing led developments.

It is therefore not considered that LP1 is sufficiently robust and does not comply with national policy and guidance. As set out in our Hearing Statement (Issue 4), it appears plain at the new homes delivery level proposed (285 dpa), affordable needs will rise not reduce, as annual need outstrips supply – 'flying in the face' of positive planning and Government policy.

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ISSUE 1: DUTY TO CO-OPERATE, LEGAL  
REQUIREMENTS AND THE COUNCIL'S BROAD  
STRATEGY

MAY 2015



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### ISSUE 1: DUTY TO CO-OPERATE, LEGAL REQUIREMENTS AND THE COUNCIL'S BROAD STRATEGY

Document references MHD006, MHD007 and MHD007a

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Whilst we welcome the provision of further information, and suggested amendments by the Council, to address concerns expressed at the Examination Hearings, we continue to have concerns relating to the Council's overall plan approach.

In its current form, LP1 lacks the certainty required to ensure that the full, objectively assessed housing need will be delivered and it is considered that proceeding on the current basis would be ineffective.

We wish to comment on the individual documents as follows:

#### **MHD006 – Note on: Extending the plan period, the need for early review of the LP1 and the relationship of LP1 with LP2**

We support the Inspector's suggestion and Council's acceptance, that the plan period should be extended. As was discussed at the Hearing session, 2031 seems an appropriate end date for the plan, and would represent a 15 year time horizon (looking forward from the current time, assuming adoption in 2016) consistent with paragraph 157 of the Framework.

#### **Section 3 - Housing Provision to 2031**

We also support the recognition (paragraph 2.4) that LP1 should make provision for additional development over any extended period.

We have provided specific comments regarding the housing trajectory (MHD003) in our separate representations for Issue 4. However of relevance to MHD006:

Reference is made at paragraph 3.6, to the inclusion of greenfield sites proposed as 'broad locations for growth' within the trajectory. As was discussed at the Hearing session, it is considered that the 'broad locations' identified by the Council should be considered as site allocations (as referred to in paragraph 6.5). It is still unclear why the Council is not referring to the sites as allocations in LP1, yet they are relying on them as contributing to their five year housing land supply. Planning practice guidance is clear (ref. 3-031-20140306) that 'deliverable sites' include those *allocated* for housing in the development plan and those with planning permission. It does not refer to the inclusion of 'broad locations' which are included in the definition of 'developable sites', which can be

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included in years 6-10 and where possible years 11-15 (ref. 3-032-20140306).

Paragraph 3.8 refers to the 'assumed capacity' of broad locations for growth, and the Council goes on to suggest adjustments to the assumed capacity of two of the identified locations in Blandford St Mary and Sturminster Newton. This highlights the current lack of certainty in relation to the quantum of development capable of being delivered at these sites and the potential risk that the full objectively assessed need for growth will not be met.

We maintain that in order for the plan to be found sound, consideration should be given to including additional site allocations, in order to provide greater certainty and clarity on the delivery of development.

Paragraph 3.7 makes reference to the level of development proposed to be delivered as part of the Gillingham Southern Extension. As set out in our separate representations to Issue 4, the projected level of delivery is considered overly ambitious and unrealistic and reiterates the need for other sites to be brought forward to meet shorter term housing needs.

## **Section 5 - The Need for an Early Review of LP1**

It is noted that the Council acknowledge that an early review of the LP1 will be required, to take account of the new SHMA being prepared for the Bournemouth, Poole and Purbeck HMA (paragraphs 5.5 and 5.14).

The Council has provided no further clarity with regards to the future timetable for the preparation of the SHMA, aside from confirmation that the methodology and detailed tables for modelling were made available in March 2015.

As was discussed by participants at the Hearing, it is likely to be difficult for the Council to deal with review issues when they are proposing a two plan approach, with LP2 effectively a site allocations document in accordance with the strategy set in LP1. Further comments are provided on this matter in relation to Section 6 below.

Paragraph 5.2 of the note states:

*"putting LP1 in place will enable broad locations for growth to be brought forward for development in accordance with an adopted development plan. This will give certainty to developers...to ensure that the (revised) housing trajectory in LP1 will be delivered"*

Further commentary is provided by the Council at paragraph 6.5 where it is suggested that the LP1 is amended to refer to the use of settlement boundaries for development management policies alongside the proposals for housing and employment set out in the policies in the Plan. There is embedded conflict in this approach and the suggested wording is vague.



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As such, it would not provide sufficient certainty for applicants and the local community in bringing sites forward through planning applications (in advance of their allocation in LP2). It is considered that the Council should look to formally amend settlement boundaries at the main towns (to include additional sites) and should not look to defer the allocation of sites until LP2. It also places the council at risk of 'opportunistic' development proposals which may not be sustainable.

Paragraph 5.7 notes that any future consideration of the new SHMA, consideration will need to be given by all local authorities in relation to the sustainable distribution of growth, taking full consideration of constraints including AONB. This approach should have been taken in the formulating the Council's strategy in LP1. However, we have significant concerns in relation to the consideration of the AONB (as set out in our separate representations on Issue 9 – Shaftesbury).

## **6. The relationship between the Local Plan Part 1 and Part 2**

The Council remains committed to progress with a two part plan, however they have failed to provide clear justification for this approach in accordance with planning practice guidance (ref. 12-012-20140306).

Paragraphs 6.3 and 6.4 suggest that this approach will enable flexibility, in enabling choice to local communities through the preparation of neighbourhood plans and in defining sites through LP2. However, it is considered that the deferral of identifying sites through a separate document risks the prospect of meeting the full objectively assessed housing need and the ability to maintain a deliverable five year supply.

Paragraphs 6.9 and 6.10 provide an indication as to how the Council might look to review LP1 to consider the new SHMA. As mentioned above, in a two part plan approach, such a review of the overall strategy is likely to prove challenging and potentially unwieldy and reiterates our view of the need for a single, more streamlined document.

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**MHD007 – Note on: Reappraising the Council’s approach to development in the countryside to promote a strong rural economy**

As set out in paragraph 2.1, concern was expressed at the Hearing sessions that the Council’s approach to development in the rural area was simply the residual ‘leftover’ amount of development required in the District, outside of that proposed to be accommodated in the main towns. As such, it did not reflect the specific needs of the rural area.

We support the approach set out in MHD007 to retain settlement boundaries at a number of more sustainable villages in order to for infill development (paragraph 4.6).

As set out in our representations to Issue 9 (Shaftesbury), we do have concerns with the reactive approach taken by the Council, which has meant that their evidence base is partial. Whilst the further information at Appendix 1 (and clarification at MHD007a) in relation to the needs of rural areas, we would question whether the information is sufficient to provide an indicative strategy for growth in these areas.

Aside from the differentiation between MSVs and LSVs, no further information in terms of suggested levels of growth for individual MSVs is provided. As such, it is not considered that a sufficient framework is provided to guide the identification of sites in LP2 and in assisting communities in the preparation of neighbourhood plans.

Paragraph 4.9 of the document states that *"those villages that are less sustainable would be discouraged (but not excluded) from preparing a NDP"*. It is not the role of the local planning authority to suggest whether or not a community should, or should not, prepare a neighbourhood plan. Planning practice guidance (ref. 41-002-20140306) is clear that neighbourhood planning is right which communities can choose to use. The local authority should not therefore be discouraging communities who may wish to consider preparing such a document.