

**Gladman Developments Ltd**

**Representations on**

**North Dorset Local Plan Part 1**

**Main Modifications Consultation**



**September 2015**

# CONTENTS

<b>Executive Summary</b> .....	<b>2</b>
Overview.....	2
<b>1 Main Modifications MM1 and MM2 – Extending the Plan Period and Early Review</b> .....	<b>3</b>
1.1 Modification Overview .....	3
1.2 Modification Analysis .....	3
1.3 Conclusions.....	4
<b>2 Main Modification MM3 – Stalbridge and the Villages</b> .....	<b>5</b>
2.1 Modification Overview .....	5
2.2 Modification Analysis .....	5
2.3 Conclusions.....	6
<b>3 Main Modification MM5 – Policy 6 Housing Distribution</b> .....	<b>7</b>
3.1 Modification Overview .....	7
3.2 Modification Analysis .....	7
3.3 Conclusions.....	8
<b>4 Main Modification MM14 – Policy 16 Blandford</b> .....	<b>10</b>
4.1 Modification Overview .....	10
4.2 Modification Analysis .....	10
4.3 Conclusions.....	10

## EXECUTIVE SUMMARY

### Overview

- i. Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the Main Modification to the North Dorset Local Plan. This follows our participation in the Local Plan Examination hearing sessions in March this year and our previous submissions on the Council's Local Plan Focussed Changes and Mid Hearing Document consultations.
- ii. Through our previous submissions on the Local Plan Gladman have questioned the adequacy of the Council's housing requirement and proposals for bringing forward development in the district's rural settlements. We queried whether the authority's target to provide 280 dwellings per annum was founded on a robust evidence base and was sufficiently aspirational, suggesting that further housing needed to be provided to cover at least a 15-year plan period. As submitted the Council's strategy for Stalbridge and the villages was overly restrictive and unlikely to be effective in delivering further development.
- iii. Whilst Gladman are therefore concerned to see that the Council are continuing to progress their Local Plan on the basis of their submitted housing requirement, we welcome the decision to now extend the Local Plan period to 2031 and recognise that it would be pragmatic to undertake an early Plan review. In light of our previous representations on the Local Plan's approach to development in the district's countryside villages, we support the general principle of proposing a more permissive strategy towards development in these locations.
- iv. As submitted through our Examination Statements and Mid Hearing Document representations, Gladman have an interest in land to the south east of Blandford St Mary, north of Ward's Drove. In this regard we welcome the recognition that this site now represents a suitable location for residential development as part of delivering a higher level of housing in this location. We submit that there are no significant constraints that would preclude development from coming forward in this location.
- v. The remainder of these submissions are structured to respond to the Council's individual Local Plan Main Modifications:
  - Main Modifications MM1 and MM2 – Extending the Plan Period and Early Review
  - Main Modification MM3 – Stalbridge and The Villages
  - Main Modification MM5 – Policy 6 Housing Distribution
  - Main Modification MM14 – Policy 16 Blandford

# **1 MAIN MODIFCATIONS MM1 AND MM2 – EXTENDING THE PLAN PERIOD AND EARLY REVIEW**

## **1.1 Modification Overview**

- 1.1.1 Main Modifications MM1 and MM2 set out the Council’s proposals for extending the Local Plan period and the need for an early Plan review. At the request of the Local Plan Inspector, provision is now planned for 5,700 homes from 2011 to 2031, with a requirement for a further 1,500 dwellings of supply. In response to questions over the adequacy of the Council’s existing housing requirement and the role of the emerging Eastern Dorset SHMA, it is now intended to retain the authority’s proposed housing target of 285 dpa, taking account of a second homes allowance, and to commit to an early review of Local Plan Part 1.

## **1.2 Modification Analysis**

- 1.2.1 In light of our previous submissions to the Local Plan Examination and Mid Hearing Document representations, Gladman welcome the proposal to extend the coverage of the Local Plan from 2026 to 2031 and to plan for a total revised housing requirement of 5,700 dwellings over the Plan period. Helping to ensure consistency with the minimum Framework requirement for Local Plans to cover at least a 15-year time horizon post-adoption, we support the recognition that there is now a need to identify an additional supply of 1,500 dwellings, taking account of a second homes allowance, over this extended period.
- 1.2.2 Through our previous representations Gladman have questioned the adequacy of the Council’s proposed housing target and whether this is based on a robust assessment of the authority’s housing needs. We queried whether the target to provide 280 dpa was consistent with the Framework requirement to significantly boost the supply of housing in light of the authority’s past delivery performance, and took account of the full range of factors that must be considered when objectively assessing housing needs.
- 1.2.3 In light of our past submissions Gladman would therefore be concerned by the decision to advance the Local Plan based on a housing requirement that may not be sufficiently aspirational and founded on a deficient evidence base. As set out in our Matter 4 Examination Hearing Statement and supported by an independent critique of the authority’s housing needs by consultants GVA, it is clear that further work must be undertaken to understand what the Council’s objectively assessed needs would be. Gladman would question the ability to adopt a housing requirement that without further explanation and justification could not be considered sound.
- 1.2.4 Whilst maintaining our previous objections to the Council’s housing target, Gladman recognise that it would be pragmatic to undertake an early review of the Local Plan to consider the findings of the emerging Eastern Dorset SHMA and its implications for housing delivery across the wider housing market area. In this respect we welcome the amendments to Local Plan introductory paragraph 1.9, which make it clear that a review will be commenced shortly after the Local Plan is adopted.

Gladman suggest that this commitment may benefit from further commentary on the specific timescales in which the Local Plan review will be undertaken.

- 1.2.5 Gladman remind the Council that the preparation of the Eastern Dorset SHMA should be undertaken with full regard to the requirements of the Framework and Planning Practice Guidance on Housing and Economic Development Needs Assessments. Assessing the need for housing taking account of household and economic projections, the SHMA should consider whether the level of housing should be increased to address market signals of housing supply and demand and meet the authority's affordable needs in full. Gladman remind the Council that the process of identifying and meeting objectively assessed needs should be undertaken with full regard to the Duty to Cooperate.

### **1.3 Conclusions**

- 1.3.1 Gladman welcome the decision to extend the Local Plan period by a further five years and plan for a revised housing target of 5,700 homes from 2011 to 2031. Ensuring the Plan covers at least a 15-year time horizon post-adoption, we support the recognition in MHD006 that there is now a need to identify as additional supply of 1,500 dwellings over the Council's extended Plan period.
- 1.3.2 Although Gladman remain concerned that the Local Plan is continuing to progress a housing requirement that is not founded on a robust evidence and may not be sufficiently aspirational to meet the district's needs, we recognise that it would be pragmatic for the authority to undertake an early Plan review to consider the findings of the emerging Eastern Dorset SHMA. Helping to align Plan preparation across the wider housing market area, we suggest that the proposed amendments to Local Plan introductory paragraph 1.9 would benefit from further commentary on the specific timescales in which the Local Plan review will be undertaken.

## **2 MAIN MODIFICATION MM3 – STALBRIDGE AND THE VILLAGES**

### **2.1 Modification Overview**

2.1.1 Main Modification MM3 sets out the Council’s proposals for amending the Local Plan’s approach to development in Stalbridge and North Dorset’s villages. Reflecting the concerns of the Local Plan Inspector over the previous restrictive approach to development in the authority’s countryside villages, the Council is now proposing to advance a more permissive strategy towards growth in these locations, reinstating the identification of Stalbridge and the authority’s 18 larger villages for the purposes of guiding development and the use of settlement boundaries. This has been supplemented by further work to understand the specific housing needs of the district’s rural areas.

### **2.2 Modification Analysis**

2.2.1 As submitted Gladman considered the Local Plan’s strategy to further development in Stalbridge and the villages was neither justified nor effective. Seeking to provide a minimum of just 230 dwellings in these locations over the Plan period, we submitted that the Local Plan’s approach failed to take account of role and ability of individual settlements to accommodate further sustainable development and created uncertainty as to whether their housing needs would be met. The authority’s unjustified policy of restraint was inconsistent with the requirements of the Framework and Rural Housing PPG.

2.2.2 In light of our previous representations and the concerns raised by the Inspector at the recent Local Plan Examination Hearings, Gladman now welcome the proposal to advance a more permissive policy approach to development in Stalbridge and the villages. Based on the Option 3A proposal outlined in the authority’s March 2012 Moving Forward with the Spatial Strategy Panel Report rather than a full re-appraisal on the Council’s approach, MHD007 describes how the Council’s revised framework for further development in these settlements is intended to retain the principle of maximum choice for local communities, whilst providing guidance on those locations that are considered to be more sustainable in terms of their size and the level of services they provide.

2.2.3 Whilst supporting the general principle of allowing for further development in the authority’s rural areas, Gladman continue to be concerned that the Council’s revised strategy for Stalbridge and the villages lacks clarity and may continue to deliver insufficient housing in its current form. Although the Council is now proposing to highlight those settlements that are considered to be more or less sustainable for the purposes of guiding development, there is no reference to the level of growth that each of these locations could deliver or how this will be secured through the Neighbourhood Plan or allocation processes. The Council should ensure that each of the district’s settlements have the opportunity to support further sustainable development through an effective policy framework.

- 2.2.4 The Council's revised proposal to provide a total of 826 dwellings in North Dorset's rural areas would result in the delivery of 177 further homes through allocations and Neighbourhood Plans across Stalbridge and the 18 larger villages. Lower than the identified need to provide 88 affordable dwellings per annum in the district's rural areas, this requirement is derived from an assessment of future housing needs based on projections of net and zero migration. Gladman note that there is a lack of consistency in the Council's approach to deriving housing targets at the authority-wide and rural-specific levels. To provide the opportunity for further sustainable development in each of the district's settlements the Council's proposed housing target for Stalbridge and the villages should be expressed as a minimum.
- 2.2.5 The Council's revised proposals for the district's rural area includes the reinstatement of settlement policy boundaries for Stalbridge and the 18 larger villages, providing the opportunity for infill development in these locations. Whilst welcoming the more positive approach to development that this amendment provides, Gladman note that the settlement boundaries around the district's remaining villages will continue to be removed. In this regard Gladman remind the Council of the guidance set out in paragraph 001 of the Rural Housing PPG, which makes clear that all settlements can play a role in delivering sustainable development in rural areas. Gladman would be opposed to the use of settlement policy boundaries if these would only serve to restrict otherwise sustainable development from going ahead.

## **2.3 Conclusions**

- 2.3.1 Gladman welcome the Council's decision to progress a more permissive approach to development in the district's rural settlements, however we remain concerned that the authority's revised strategy for Stalbridge and the villages lacks clarity and may continue to deliver insufficient housing in these locations. The Council should ensure that each of the authority's settlements has the ability to deliver the sustainable development they can and should accommodate through an effective policy framework. The Council should recognise that each of authority's settlements, whether large or small, will have development needs that should be met.
- 2.3.2 Whilst recognising the work undertaken to identify the specific housing needs of the district's rural areas, Gladman note that there is a lack of consistency between this evidence and the basis for setting the Council's overall housing target. The level of housing that this work suggests is required in the authority's rural areas would result in an average of just 9 additional dwellings being delivered in Stalbridge and each of the 18 larger villages through allocations and Neighbourhood Plans, and is lower than the 88 annual homes that would need to be provided to meet the rural area's affordable needs. To provide sufficient scope for further development, we submit that the level of housing sought in these locations should be expressed as a minimum.

## **3 MAIN MODIFICATION MM5 – POLICY 6 HOUSING DISTRIBUTION**

### **3.1 Modification Overview**

3.1.1 Main Modification MM5 sets out a series of amendments to the overall spatial distribution of housing in the North Dorset district area. Reflecting the need to accommodate the Council's revised housing requirement of 5,700 dwellings over an extended Local Plan period, the Council's amendments identify the authority's proposal to increase the level of housing to be provided in Blandford Forum and St Mary to at least 1,200 homes between 2011 and 2031.

### **3.2 Modification Analysis**

3.2.1 Gladman welcome the Council's decision to revisit the provisions of Policy 6 and the overall spatial distribution of housing in the North Dorset district area. Taking account of the need to increase the Council's proposed housing requirement and accommodate a revised housing target of 5,700 over the Local Plan period up to 2031, we particularly support the decision to increase the level of housing directed to Blandford Forum and St Mary, reflecting the town's status as a suitable location for further sustainable growth.

3.2.2 Mid Hearing Document MHD006 provides further commentary on the sources of supply that have been identified to meet the Council's modified housing requirement. Taking account of completions, extant permissions, potential allocations and windfall sites, MHD006 describes how the remaining shortfall of 350 dwellings against the authority's revised housing target can be met and exceeded through adjustments to the assumed capacity of certain broad locations for growth and the authority's rural areas.

3.2.3 In light of the requirement to ensure a sufficient supply of homes to meet Local Plan's extended housing target, Gladman welcome the recognition in MHD006 that there is now the ability to expand the capacity of the Broad Location for Growth to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a site area that would now include land to the north of Ward's Drove, we support the acknowledgement that this location could now support the delivery of 450 homes, reflective of the area's full development potential.

3.2.4 As submitted through our previous representations, Gladman submit that there are no significant constraints, infrastructure, land ownership or viability issues that would preclude further development coming forward on land to the south east of Blandford St Mary, north of Ward's Drove within the plan period. This site could be successfully developed to provide a proposal that is well related to its surroundings and the existing form of the settlement. Increasing the level of housing directed to this location, consistent with a boundary that extends to Ward's Drove, would provide a logical and defensible boundary to development.





**Figure 1** Land South East of Blandford St Mary, North of Ward's Drove

- 3.2.5 Land to south east of Blandford St Mary, north of Ward's Drove is considered to be deliverable as it is available now, offers a suitable location for development and is achievable. Gladman and the landowner are committed to delivering a high quality scheme in this location and would welcome further discussions with the Council regarding this.
- 3.2.6 At the Local Plan Examination hearings a number of participants raised concerns as to the timescales for adopting Local Plan Part 1 and the subsequent preparation of a Part 2 allocations document. They queried the effects this two stage approach would have on bringing development forward, with allocations for the majority of the Local Plan's broad locations deferred to this second stage of the Plan making process. In this context Gladman welcome the clarification provided in paragraph 6.5 of MHD006 which sets out the authority's position on the definition of settlement boundaries alongside the Local Plan's housing proposals, enabling development to be brought forward on these sites ahead of Local Plan Part 2.
- 3.2.7 Gladman remind the Council that it must be satisfied that it can demonstrate a sufficient and robust supply of deliverable and developable land to meet the area's housing needs, taking account of any shortfalls that may arise through sites failing to come forward as anticipated or delivering the level of homes originally planned. It should recognise that in some instances achieving a deliverable supply of housing land may be best achieved through sites that do not benefit from a formal plan allocation.

### **3.3 Conclusions**

- 3.3.1 Gladman welcome the Council's decision to amend the overall spatial distribution of housing sought in the district through Local Plan Policy 6. Reflecting the need to accommodate a revised

housing target of 5,700 homes over the Local Plan Period 2011-2031, we particularly support the decision to increase the level of housing directed to Blandford Forum and St Mary to at least 1,200 dwellings over the period 2011-2031.

- 3.3.2 Gladman welcome the recognition in MHD006 that there is now the ability to expand the Broad Location of Growth to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a site area that would now include land to the north of Ward's Drove, we support the acknowledgement that this location could now support the delivery of 450 homes, reflective of the area's full development potential. Gladman and the landowner are committed to delivering a high quality development scheme in this location.

## **4 MAIN MODIFICATION MM14 – POLICY 16 BLANDFORD**

### **4.1 Modification Overview**

4.1.1 Main Modification MM14 sets out a series of amendments to Local Plan Policy 16 and the Council's strategy for the town of Blandford. Recognising the need to accommodate a revised housing target of at least 1,200 homes in the settlement over the authority's extended Plan period, the Council's proposed changes seek to make further specific amendments to the provision of development on land at Lower Bryanston Farm and Dorchester Hill, in-line with advice received from Natural England.

### **4.2 Modification Analysis**

4.2.1 Whilst noting the current audit trail of amendments provided by the Council's Local Plan Focussed Changes and Mid Hearing Documents consultations, Gladman submit that the provisions of Policy 16 would benefit from additional wording specifying the scale and location of development expected to come forward on land to the south east of Blandford St Mary, through the St Mary's Hill Site. To provide further certainty for both applicants and decision makers, we submit that the policy should state that at least 450 dwellings are to be provided in this location over the Plan period, commensurate with a boundary that extends to Ward's Drove. Gladman submit that this amendment would provide further clarity on the direction and location of development within the town.

### **4.3 Conclusions**

4.3.1 Gladman submit that the provisions of Policy 16 should now be amended to make clear that at least 450 dwellings are to be provided on land to the south east of Blandford St Mary, the St Mary's Hill site. Commensurate with a revised boundary that extends to Ward's Drove, we submit that this amendment would provide further clarity for both applicants and decision and makers on the direction and location of development within the town.