

NORTH DORSET LOCAL PLAN 2011 – 2026 PART 1

EXAMINATION

**NDDC Local Plan: Inspector's requests and points arising during
hearing sessions**

Issue 4: Housing

Note on: The delivery of affordable housing.

May 2015

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1. Recommendation

- 1.1 The recommendation is that no changes are required to the Local Plan arising from further consideration of the delivery of affordable housing.

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2. Introduction

- 2.1 At the Examination in Public of the Local Plan Part 1, when discussing housing matters at Session 5, the Inspector looked at a number of matters relating to housing supply and the provision of affordable housing. In this context, he asked the Council to show how it has considered all reasonable alternatives and opportunities for delivering affordable housing in accordance with the NPPF, ensuring that potential delivery on brownfield land is considered.
- 2.2 With reference to affordable housing, amongst the points at paragraph 47 of the NPPF it is required that to boost significantly the supply of housing, local planning authorities should 'for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target'.
- 2.3 At paragraph 49 of the NPPF it is stated that 'Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.'

3. Reasonable alternatives and opportunities for delivering affordable housing

- 3.1 Affordable housing will be delivered within the framework of the Local Plan. Developers and Registered Providers will be expected to deliver the affordable housing requirements through the planning process and the Council will secure the appropriate amounts of affordable housing through legal agreements.
- 3.2 In developing its approach to the provision of affordable housing, the Council has taken particular account of the 2012 SHMA Update (MHN004) which indicates the level of need for affordable housing in the District. It also highlights the important role of the private rental sector in meeting this need. The SHMA Update suggests 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.
- 3.3 In addition to the need for affordable housing being met in part through the private rental sector, there are viability constraints to the provision of affordable housing

through on-site provision across the District. Opportunities for the provision of affordable housing are not consistent for all areas. Part of the negotiations to secure affordable housing on a site will therefore include a consideration of viability.

- 3.4 The level of affordable housing provision at each town is based on the assessment of viability contained in the North Dorset Affordable Housing Provision and Developer Contribution Report (MHN017). This suggests that residual land values in Gillingham are lower than across the remainder of the District and therefore higher levels of affordable housing provision would not be viable. For this reason, the affordable housing targets proposed in the Local Plan vary from 30% to 40% to reflect residual land values whilst maximising the delivery of affordable housing.
- 3.5 The policies in LP1 indicate that about 1,480 additional affordable dwellings would be delivered in the four main towns over the plan period to 2026. As the four main towns are the most sustainable locations, the delivery of affordable housing in these places is considered to be the most appropriate approach. As the largest centres of population, they are likely to be the locations where the greatest need will arise. The SHMA Update estimated that the greatest need was in Blandford and Gillingham, which have the highest levels of proposed development in LP 1.
- 3.6 In the rural areas, there is the opportunity to deliver affordable homes on exception sites under Policy 9 where a need is identified. Additionally, through neighbourhood plans or via the 'opt-in' route, local communities can bring forward housing. This may include affordable housing to meet need or to deliver community aspirations.
- 3.7 The Council's housing trajectory sets out the delivery of housing over the plan period. Affordable housing constitutes an important component of this. It is assumed that its delivery will reflect the overall trajectory in line with the provision of affordable housing as part of new development. While national guidance states that consideration needs to be given to increasing overall housing delivery where it might contribute to delivering the identified need for affordable housing, 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.

4. Brownfield development opportunities

- 4.1 National policy no longer adopts a 'brownfield first' approach to housing development but nevertheless still encourages 'brownfield' development¹, which may take the form of residential infilling. In December 2014 and January 2015 the

¹ Paragraph 17, National Planning Policy Framework, DCLG (March 2012). The NPPF does not refer to 'brownfield' land but refers to land which has been 'previously developed'.

Government consulted on proposed changes to the planning system to bring forward more housing development on brownfield land. In January 2015 the government published its 'Building more homes on brownfield land' consultation document, the focus of which was to 'enable the development of houses on brownfield land'. The intention is that by 2020 over 90% of brownfield land suitable for housing, and which does not already benefit from planning permission, should be subject to Local Development Orders (LDOs). Following this, in March this year the Secretary of State introduced the Local Development Order Incentive Fund to encourage and support local planning authorities to bring forward previously developed sites by way of LDOs.

- 4.2 The Housing Topic Paper (MHN002) showed that, on average, brownfield site development contributes about 40% of total residential development. In the North Dorset SHLAA, enough land was identified to provide 1,500 dwellings on brownfield land. The majority of this brownfield land is identified as being in the five year supply. This highlights the difficulty of identifying brownfield land in a rural district such as North Dorset, especially for a period beyond five years into the future.
- 4.3 There is greater potential in the towns than in the rural parts for brownfield development and policies in the Local Plan are aimed at ensuring that those suitable areas of brownfield land that do exist are brought forward for housing and other uses. Local plan policies seek to concentrate the vast majority of development at the District's four main towns, where most brownfield land is located.
- 4.4 Further, part of the Council's spatial approach to economic development in Policy 11, The Economy, is to identify and bring forward mixed-use regeneration sites on the edge of existing town centres which embrace brownfield land. The policy lists the four main sites: the Brewery site, Blandford St Mary; the Station Road area in Gillingham; the Station Road area in Sturminster Newton; and land between the Town Centre and Christy's Lane, Shaftesbury.

5. Conclusion

- 5.1 The Council's view is that the framework in LP1 is sufficiently robust to deliver affordable housing having regard to viability constraints and the role of the private rented sector. The approach taken, reflecting residual land values is considered to be the most appropriate given the available evidence and is therefore justified.
- 5.2 The evidence shows that the Council will need to bring forward significant areas of greenfield land in order to meet the full assessed need for additional housing development. However, policies in the Local Plan are also aimed at ensuring that those suitable areas of brownfield land that do exist are brought forward for housing and other uses.