

**For office use only**

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 Representation # \_\_\_\_\_

# North Dorset Local Plan Part 1

## Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

### Response Form

**For each representation you wish to make a separate response form will need to be completed.**

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at [www.dorsetforyou.com/planning/north-dorset/planning-policy](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at: [www.surveymonkey.com/s/NorthDorsetLocalPlan](http://www.surveymonkey.com/s/NorthDorsetLocalPlan)

**Deadline: 5pm on 24 January 2014. Representations received after this time may not be accepted.**

### Part A – Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form on the pre-submission North Dorset Local Plan Part 1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title	Mr	Mrs
First Name	Shaun	Sarah
Last Name	Pettitt	Hamilton-Foyne
Job Title( <i>where relevant</i> )	Strategic Land Manager	Director
Organisation ( <i>where relevant</i> )	Persimmon Homes (South West)	Pegasus Group
Address		Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire,
Postcode		GL7 1RT
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## Part B – Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258 484201.

### 1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

### 2. Please state the part of that document you are commenting on:

Paragraph Number: Para 5.12 – 5.14 district-wide housing provision	Policy/site:	Policies map:
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### 3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes  No

### 4. Do you consider the Local Plan to be 'sound'?

- Yes  No

### 5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

**6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.**

District wide housing Provision

It is noted that para 5.12 states that all the local planning authorities in the Bournemouth and Poole Housing Market Area commissioned consultants to produce a SHMA in 2008 (evidence base is 2007 as referred to in para 1 of the summary to the final Report, January 2012). The original SHMA was then updated in 2011 (the eight local authorities in Dorset: Bournemouth, Christchurch, East Dorset, North Dorset, Poole, Purbeck, West Dorset, Weymouth and Portland commissioned Justin Gardiner Consulting {JGC} and Chris Broughton Associates (CBA) to prepare an update to the 2007/8 SHMA, the update was published in January 2012 (this pre-dates the NPPF) and is based on the 2007 DCLG guidance and PPS 3.

The update was intended to provide an understanding of the current housing market in the county and in particular focused on housing needs and market demand, however, as the information base is 2011, it is questionable whether this is the most recent information available, especially given the changes in the last two years and also the comments of the Inspector for the neighbouring local planning authority. By the time the Examination Hearing Sessions take place the data will be three years out of date.

The NPPF states in para 158 that: *"Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for the area. Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."* My emphasis.

The National Planning Practice Guidance states that evidence needs to inform what it in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date and when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available and if necessary the plan adjusted in the light of this information.

Given the Inspector's view on the West Dorset Weymouth and Portland Local Plan (Inspector's concerns 10<sup>th</sup> December 2013) which are set out below, an objection is made to the evidence base that North Dorset District Council relies on to determine the overall housing provision (as the SHMA for Bournemouth and Poole was produced at the same time as the SHMA for Dorchester/Weymouth in 2007 and similarly was updated in 2011 and again published in January 2012. The SHMA was also prepared by JG consulting and CBA).

The Inspector for West Dorset, Weymouth and Portland has stated that he has fundamental concerns about the plan because he has reservations about the evidence base supporting the housing need assessment for both plans.

He states that *"Despite work to update the original Strategic Housing Market Assessment it is essentially out of date. The original study was undertaken when the approach to housing needs was different and when the emerging Regional Strategy (RS) provided the basis for determining the growth in each district. Although the RS remained in draft form and has since been revoked, it provided a rigorous and independent approach to assessing housing needs*

*and a context for understanding the demands on each area. It would be helpful, in my view, to know what and how circumstances have changed since the draft RS was produced and what factors have influenced and led to the housing numbers which are being advocated in the current Plan."*

The Inspector has asked for an explanation of why housing numbers have changed since studies for the draft Regional Strategy and has asked for an explanation of the components of household change in the Dorset districts. The Regional Strategy housing target for North Dorset was 350 dpa.

See also representations on paras 2.11 – 2.12

It is noted that the updated SHMA in relation to North Dorset states that *"trend based data suggests household growth of around 273 per annum for the period 2011 to 2031 and so a housing delivery figure (on the basis of this figure) might be around 280 per annum (to take account of a small vacancy rate)."* Para 5.13 of the Plan. This is the figure that has been used to inform the housing requirement in the plan. This is a significant reduction from 7,000 homes over 20 years (2006 – 2026) i.e. 350 per annum that was included in the Proposed Changes to the RSS.

The proposed housing provision of 280 dwellings equates to 4,200 dwellings over the plan period 2011 – 2026, this is derived from trend based data suggesting household growth of around 273 per annum, however, it is considered that this does not provide a "step change" in housing provision or significantly boost the housing supply over the plan period in accordance with the NPPF para 47.

The AMR published in December 2013 indicates completions for the last 5 years these reflect the lower completions during the recession, but a significant increase for completions for the period 2011/12 at 375 dwellings.

The adopted Local Plan covered the period 1994 - 2011 it is noted that housing completions exceeded the provision in the adopted Local Plan ( the housing requirement was 5,900 dwellings i.e. an average of 347 per annum, the actual completions were 6,705 i.e. an oversupply of 808 dwellings according to the AMR April 2011).

Housing affordability is a key issue. The South West Housing Strategy prepared in 2005 and covering the period 2005 – 2016 sets out priorities for housing, these are not dissimilar from the Dorset Sustainable Community Strategy updated to cover the period 2010 to 2020, and the Local Enterprise Partnership (LEP). The strategic priority related to housing is that *"everyone can live in a good quality home and neighbourhood that meets their needs."* This priority focusses on the lack of affordability, which is caused by high house prices and low incomes.

It is considered that that low housing provision of only 280 per annum compared with past rates in the adopted Local Plan and more recently evidence since the recession, will not address the housing needs of the district, in particular the affordable housing needs.

Evidence from the latest AMR 2013 at para 2.5 states that North Dorset faces a challenge to provide enough affordable housing for local people. *"There is a real disparity between what local people earn and the cost of buying a house in the district. This is reflected by the high house price income ratio in 2012 of 9.93 in the District."* This compares to 9.61 for Dorset and 6.74 for England. The Figure 4 in the SHMA update January 2012 shows that North Dorset has one of the highest "house-price to income " ratios in the country.

In this context it should also be noted that the SHMA summary for North Dorset states that the district has a dwelling stock more heavily biased towards detached houses, semi-detached houses and bungalows. The main dwelling type is detached representing 32.6% of dwellings. This compares with 26% living in detached housing

over the Bournemouth and Poole SHMA.

Para 3.33 of the Background Paper Meeting Housing Needs states that *"housing issues across the wider Dorset sub-region need to be addressed primarily by local authorities and other bodies to meet their obligations under the Duty to Co-operate."* The Background Paper on the duty to co-operate details the joint working on the SHMA and SHLAAs and affordable housing Viability Studies and the implications of each LPAs strategy. However, the housing provision as now proposed appears inadequate to address these significant issues which will also undermine the delivery of the wider objectives of the Plan.

It is noted that the main findings of the SHMA 2011 update, bringing together information from a range of sources about need and supply *"that there is an annual need to provide 387 additional units of affordable housing per annum if all needs are to be met ( in the five year period from 2011 to 2016). This figure is virtually the same as that derived in the 2007/08 SHMA and suggests that there is still a significant need to provide additional affordable housing in the District."*

The evidence base to support the Pre-Submission Plan refers to a Viability Study being undertaken by Three Dragons, however the date of this report is April 2009 (referred to on page 101 of the Local Plan), it is assumed that the final report is January 2010, however, this is based on the period when the housing market was suffering a significant downturn as a result of the 'credit crunch', (the analysis of housing market values relates to January 2009). It is considered that this evidence base is out of date and therefore not consistent with the NPPF para 158 *"Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."*

The National Planning Practice Guidance also expands upon this point and states that evidence should be kept up to date, and when approaching submission, if key studies are already reliant on date that is a few years old, they should be updated to reflect the most recent information available (and if necessary adjusted).

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities. It should also be noted that there is an ageing population and if current trends continue then the number of people in key working age bands is likely to decline which may potentially generate a labour shortage over the plan period. This may act as a barrier to economic growth in the District and undermine the vision and objectives of the plan.

It is clear from the evidence base that the SHLAA identifies a land supply with a capacity in excess of 13,000 dwellings and the background paper Meeting Housing Needs states that using the 2010 base year, 1,872 dwellings were considered to be deliverable within 5 years as they had no policy ownership constraints relating to them, this is about 374 dwellings per annum. The supply of suitable housing sites is therefore not an issue constraining the overall housing provision proposed in the plan as more land can be identified than is required to meet the proposed provision of 4,200 dwellings (280 per annum).

It is considered that the level of housing provision proposed in the plan will fail to meet housing needs and exacerbate the need for affordable housing which is already acknowledge to be an issue as the district has one of the highest housing income ratios in the country. The Council proposes to reduce the housing provision to 280 dwellings per annum, which is approximately 20% reduction from the adopted Local Plan. Persimmon Homes consider that the overall housing provision should be increased and the plan period extended to at least 2031 so that the strategy is inconsistent with the NPPF para 47 which aims to significantly boost housing land supply.

*Continue on a separate sheet if necessary*

**7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound?** It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan period should be extended to 2031 in order to be consistent with the NPPF para 157 so that the plan provides certainty over the plan period and so that there is a 15 year period post adoption. There is a need to take into account the longer term requirements and for the plan to be kept up to date in accordance with the NPPF. (It should be noted that the SHMA update refers the housing market model, which was designed to look at the likely impact of demographic change on both market and affordable housing requirements over the next 20 years i.e. to 2031 and was based on studying occupancy pattern and protecting how these might change in the future as the overall population and age structure of an area develops. (Para 6.7 of the SHMA summary)

In accordance with extending the plan period the housing provision should be increased to at least 5,600 dwellings, it is noted that affordability is a critical issue in the district with the house price income ratio being 9.93. A range of housing in terms of scale and mix and range of tenures that the local population is likely to need over the plan period should therefore be delivered in order to address the imbalance in the housing stock.

Consideration should also be given to increasing the housing provision over and above 5,600 dwellings based on the SHMA, particularly as the SHMA update January 2012 has identified that the affordable housing need is actually 387 additional units affordable housing per annum which is virtually the same as that derived from the 2007/08 SHMA and suggests that there is still a significant need to provided additional affordable housing in the district. (para 5.2 of the SHMA update summary for North Dorset). Whilst the SMHA states that in reality 387 affordable units per annum in not likely to be achieved, an increase in the housing provision above 280 dwellings per annum as proposed would be a positive action in addressing the significant house price income ratio in North Dorset.

*Continue on a separate sheet if necessary*

**8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?**

No, I do not wish to participate in the oral examination

Yes, I would like to participate in the oral examination

**9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary.** Please note that the Inspector determines who is heard at the examination.

Persimmon Homes South West has concerns about the soundness of the plan in respect of the plan period and the housing requirement and the deliverability of the urban extension to Gillingham.

**10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment.** Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

**11. Do you wish to be notified of any of the following?** Please tick all that apply. We will contact you using the details you have given above.

- That the Local Plan Part 1 has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1.

Signature: \_\_\_\_\_

Date: 23<sup>rd</sup> January 2014

*If submitting the form electronically, no signature is required.*