

BLANDFORD ST MARY HOMES Ltd

RESPONDENT ID No. 1596

ISSUE NO. 4

NORTH DORSET LOCAL PLAN

EXAMINATION IN PUBLIC

ISSUE 4

**STATEMENT ON BEHALF OF BLANDFORD ST MARY
HOMES**

BY

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So far as the housing land requirement is concerned the respondent relies on the paper submitted in response to the pre-submission draft prepared by Anthony Pollard of Turley. This paper responds to questions of the inspector in so far as they have not already been answered by the respondent.

Q 4.3 What is the Housing market Area?

- 4.3.1 North Dorset does not fall within a single Housing market Area. Blandford is closely related to the south-east Dorset conurbation and part of that HMA. Shaftesbury is more closely related to Salisbury and part of that HMA. Sherborne is more closely related to Yeovil.
- 4.3.2 It seems to me that in this instance the Full Objective Assessment of the need for market and affordable housing is best assessed on a district basis having regard to the influence of all these HMAs but perhaps more particularly south –east Dorset because it is by far the largest and has a greater economic influence.

Q 4.4 The updated 2012 SHMA

- 4.4.1 Assessments based upon a period of economic recession cannot be relied upon to produce a FOAN for market or affordable housing. The reduced number of transactions due to the economic situation hides the latent demand, with households forced into a position where they are unable to move.
- 4.4.2 It is important to realise that even the higher Regional Strategy housing targets were based upon a constraint strategy (policy on as it has been described in the Hunston case). It did not reflect FOAN.
- 4.4.2 It is also important to realise that the number of house building completions was restrained by an embargo on the grant of planning permissions in rural areas because the Regional Plan figures had been exceeded. The embargo was a market indicator of a failure to address the Full Objective Need for market housing. Which should also be taken into account.

Q 4.9 Commitments and windfalls

- 4.9.1 Not all allocations are deliverable. Enquiries need to be made to clarify deliverability. Only when this has been done is it possible to make an educated guess at a trajectory.
- 4.9.2 Windfalls must not be overestimated. The authority should not rely on past performance without evidence that past trends will continue. Many “brownfield” sites will have been used up. The NPPF requires that garden land be excluded.

Q 4.10 Land Availability and Delivery

- 4.10.1 The housing distribution has not been soundly assessed. Greater provision needs to be made particularly in smaller settlements. SHLAA has identified many potential sites. Other sites have not been put forward for assessment which could deliver more housing.

Q 4.11 Housing mix

- 4.11.1 The planning authority should not attempt to interfere with the operation of the private market. Housebuilders will assess where the demand lies. They will not build what they cannot sell. Such policies will impact on the rate at which sites are developed and will not boost significantly the supply of housing.
- 4.11.2 The mix of affordable housing should remain flexible. It should reflect the priority needs of an area based on affordable housing surveys of individual localities at the time development is proposed. The Housing Enabling Officer and housing associations will be able to advise in each case.

Q 4.12 Meeting Affordable Housing Needs

- 4.12.1 Clearly the policies for the supply of housing will not meet the FOAN for affordable housing and is inconsistent with the NPPF. Only by increasing the requirement for market and affordable housing on greenfield sites will a reasonable provision of affordable housing be achieved.

Q 4.13 Affordable housing contribution

- 4.13.1 The first part of the policy is inconsistent with current Government Policy which has a threshold of more than 10 dwellings in the urban areas and more than 5 dwellings in the countryside.
- 4.13.2 The policy fails to distinguish between previously developed sites which have an existing use or investment value and green field sites. The viability of previously developed sites will be prejudiced. It is no policy to suggest that applicants can put forward a viability argument. That will result, as it does in other authorities, of most applications being supported by viability assessments. These should be for exceptional cases. The policy should distinguish between PDS and green field sites.
- 4.13.3 The policy should not dictate who should carry out viability assessments and particularly not the District Valuer. There are very many Chartered Surveyors in private practice who make their living carrying out valuations for all sorts of purposes. These are governed by the Rules of The Royal Institution of Chartered Surveyors. They are required to be open book valuations showing no partiality. In a dispute situation the duty of the surveyor is to the judge, inspector or chairman as the case may be. His report should be relied on as independent. I have come across cases where the planning authority is insisting on the involvement of the DV at the cost of the applicant and the cost sought by the DV is grossly in excess of the original valuation even though all the DV is doing is a desktop review.
- 4.13.4 Clearly there could be argument as to whether a site is within “the existing built up area” of settlements if the plan does not define what that is.
- 4.13.5 The wording of the entire policy is negative and off putting to a potential housebuilder and could affect delivery. It does not create the right framework to encourage stakeholders to bring forward exceptions sites.