

# **North Dorset Local Plan Part 1 Examination**

Statement submitted on behalf of the South Gillingham Consortium

Issue 4: Meeting Housing Needs

Respondent reference number: 2984

February 2015

## **Issue 4: Meeting Housing Needs, including affordable housing and the needs of gypsies, travellers and travelling showpeople (policies 6 to 10 and policy 26)**

### **Introduction**

1. This statement is submitted on behalf of CG Fry & Son, Welbeck Land, Taylor Wimpey, and the landowners at Newhouse Farm. Together the land owners and developers control approximately 102.3 hectares of land to the south of Gillingham, comprising 82% of the total site area within the proposed strategic allocation for the southern extension of Gillingham. These four parties are working together as a consortium to ensure a co-ordinated approach to the delivery of the Gillingham Strategic Site Allocation (SSA). This statement has been prepared jointly by the professional advisors of these companies and landowners.
2. This statement addresses selected Inspector's questions under Issue 4. It should be read in conjunction with the statements prepared by the Consortium in respect of Issue issues 1, 2, 5, and 8. The Consortium is working with the Council to agree a Statement of Common Ground and will endeavour to submit this to the Programme Officer no later than two weeks before the Issue 8 (Gillingham) hearing session on 18 March 2015.

### **Inspector's Questions**

**4.1 Although not explicitly stated in LP1, I interpret the figure of 4,200 dwellings (280 dwgs a year) as being the Council's objectively assessed housing need for 2011 – 2026. Is this figure justified, bearing in mind it is lower than that proposed in the former Regional Strategy? What has been the role of household projections in estimating overall housing need (see PPG paragraph 015 under Housing and Economic Development Needs Assessments)?**

3. The figure of 280 dwellings per year relates to the projected household change 2011-2031 as set out in the Bournemouth / Poole Strategic Housing Market Update 2011. This is in turn based on a combination of Dorset County Council population and housing figures and 2008 CLG household projections.
4. The modifications to Policy 6 introduced at the submission stage (November 2014) now propose a total of 4,350 dwellings across the district for the period 2011 - 2026, which equates to 290 dwellings per year.

**4.2 NPPF paragraph 47 requires the supply of housing to be boosted significantly. Between 2001 and 2011, 370 dwellings per annum were built in the District. The figure now proposed is 280 dwellings a year. Is the Council's target justified and sufficiently aspirational, in light of past rates of housing provision, including in terms of affordable housing provision? (see also question 4.12 below)**

5. The proposed drop in the rate of housing provision is a concern. As set out in our previous consultation responses, the proposed housing target should therefore be expressed as a minimum, this would provide more flexibility to adapt to changing circumstances over the plan period.

**4.3 Is the inclusion of North Dorset District within the boundary of the Bournemouth/Poole Housing Market Area (HMA) justified? What are the consequences of the use of the HMA boundary, particularly for the northern part of the District?**

6. The inclusion of North Dorset District within the boundary of the Bournemouth/Poole HMA represents a pragmatic approach that recognises the good working relationship between the Dorset local planning authorities and carries forward the boundaries established through the 2007 SHMA.

**4.4 Is the Strategic Market Housing Assessment (SHMA) sufficiently up-to-date and does it reflect the guidance on SHMAs in the NPPF (paragraph 159) and Planning Practice Guidance? The 2011 SHMA Up-date concluded that overall need for housing in the District has reduced from 350 to 280 dwellings per annum since 2008 (paragraph 4.29 of MHN001), the reason given is the economic downturn. However there is evidence that the economy is recovering so can the up-dated SHMA (2012) be relied upon, bearing in mind the current economic context?**

7. The SHMA was prepared prior to the introduction of the NPPF and associated practice guidance. Notwithstanding this, the Bournemouth & Poole SHMA has been found to be sufficiently robust as the evidence base for other Local Plans in the area which have been adopted since the NPPF came into force, including Purbeck (adopted November 2012) and East Dorset & Christchurch (adopted April 2014).

8. As expressed in our previous representations, we have concerns about the extent to which economic factors and affordability have been factored into the SHMA, and we have suggested that housing provision based on the projected household change should be considered a minimum.

9. The origin of the reference at 4.29 of MHN001 is unclear; this does not appear to be a conclusion of the SHMA.
10. It is understood that an update to the SHMA is currently being prepared. The draft findings are available to the local planning authorities and the figures have been used to inform consultation on Local Plan reviews for Poole and Purbeck.

#### **4.5 Is the Strategic Housing Land Availability Assessment (SHLAA) sufficiently up-to-date?**

11. The methodology and approach set out in the SHLAA remains reasonably robust, however certain aspects of the SHLAA are out of date, in particular the five year land supply calculations and the delivery rates set out in Appendix II. This can be addressed by a the provision of a housing trajectory based on a clear understanding of housing land supply and delivery from proposed allocations and broad locations for growth.

#### **4.6 Can the Council demonstrate a 5 year supply of housing plus appropriate buffer; and locations for growth for years 6 to10 and 11 to 15 (NPPF paragraph 47)?**

12. Paragraphs 5.65 and 5.66 of the 2014 Annual Monitoring Report (published January 2015) indicate a five year land supply of 2,060 dwellings, equating to a total supply of 6.5 years, calculated using an annual target of 280 and by annualising the past undersupply over the five year period (the 'Sedgefield' approach).
13. As noted in paragraph 3 of this statement, the modifications to Policy 6 introduced at the submission stage (November 2014) now propose a total of 4,350 dwellings across the district for the period 2011 - 2026, which equates to 290 dwellings per year. The five year land supply calculation should be based on this figure.
14. Appendix 2 of the AMR lists the sites that the Council has identified as contribution to the 5 year land supply. This appears to include a number of sites where planning permission has been refused or has expired, the inclusion of which are questioned.
15. Appendix 2 includes four sites which form part of the Gillingham Strategic Site Allocation (refs 2/2014/0968/OUT, 2/20/412, 2/20/0544, and 2/20/0372) totalling 246 dwellings. This broad quantum of development is considered deliverable within 5 years, although the geographical spread is likely to differ from that indicated in the AMR. The first phase

will be delivered on land to the east of Lodden Lakes, which benefits from a resolution to grant outline consent for up to 90 homes with the s106 agreement to be completed shortly, this is anticipated to deliver 30-45dpa from 2016. From 2018, it is anticipated that delivery will rise to 100–120dpa based on four sites across the SSA with four separate house builders producing 25-30dpa each.

16. Appendix 2 also appears to include all of the locations for development identified in Policies 16, 17, 18 and 19, although the status of these as commitments in the plan is unclear.

17. The five year land supply should be based on a housing trajectory that reflects a clear understanding of housing land supply and delivery from the proposed allocations and broad locations for growth.

**4.7 Why is there no housing trajectory included within the plan or a clearly expressed housing implementation strategy (NPPF paragraph 47)?(see also question 12.1 on monitoring)**

18. A housing trajectory would be welcomed in order to provide a clear understanding of housing delivery from sites with planning permission, allocated sites, locations for growth, and windfall sites.

**4.8 Is the Council's approach towards taking into account vacancy rates and second homes, in the overall housing figures, reasonable and justified?**

19. No comment.

**4.9 Should the contribution that existing commitments and potential windfalls make to overall housing provision over the plan period be clarified?**

20. Clarification on this would be welcomed.

**4.10 Is the proposed housing distribution (policy 6) based on a sound assessment of land availability and delivery? Is there any evidence that the proposed distribution cannot be satisfactorily achieved?**

21. The approximate scale of housing development for Gillingham in the period 2011 – 2026 in Policy 6 is “about 1,490 homes”. However, the level of housing provision for Gillingham does not reflect the full potential of the strategic site allocation. The 1,800 dwellings proposed for the Gillingham SSA (policy 21) is available and deliverable in full

on land within the Consortium's control, but the phasing of delivery extends beyond the plan period.

22. A change to Policy 6 has been proposed in order to recognise that housing provision at the SSA extends beyond the plan period, and we anticipate this will be confirmed in the Statement of Common Ground.

**4.11 Is the housing mix proposed in policy 7 justified? Is policy 7 too prescriptive? Should the reference in paragraph 5.34 be to bedroom numbers rather than size? Does the Council's approach meet the objectives of paragraph 50 of the NPPF, with regard to delivering a wide choice of family homes?**

23. Previous representations on behalf of the Consortium have suggested changes in the wording of Policy 7 to provide greater flexibility. We anticipate that these changes will be confirmed in the Statement of Common Ground.

**4.12 Bearing in mind the SHMA Up-date (MHN004) concludes in paragraph 5.7 that there is a need to provide an additional 387 units of affordable housing per annum (up to 2016), has the Council placed sufficient weight on meeting the District's affordable housing needs? Will the Council's policies deliver a reasonable amount of affordable housing and in the locations where need is greatest? Is the advice in paragraphs 173 and 174 of the NPPF sufficiently reflected in LP1? What is the justification for seeking a reduced provision in Gillingham?**

24. The concentration of provision at the market towns will help the provision of affordable housing where need is greatest. The reduced provision in Gillingham reflects the difference in values in this part of the District, although the justification for the difference in provision between the SSA and other parts of Gillingham is unclear. It should be noted that the viability study used to support the affordable housing target proportions was prepared by Three Dragons in June 2009.

**4.13 Is the Affordable Housing threshold justified and would the requirements of policy 8 put at risk the financial viability of any housing schemes? Is the policy sufficiently flexible? Is there any evidence to support making a distinction between town centre and non town centre development? Is the reference to the involvement of the District Valuer appropriate?**

25. The reference to the involvement of the District Valuer is not considered appropriate as this reduces any certainty in the decision making process for the developer. It is normal practice that the Council may seek a second opinion in terms of viability (and often for this to be paid for by the applicant), though viability is a subjective matter and it may not

always be possible to rely on the conclusions of the third party. The policy indicates that where the level of affordable housing proposed is below the target, 'the developer may be offered an opportunity (subject to certain requirements) to involve the District Valuer with a view to securing a mutually agreed level of affordable housing provision'. This does not give a clear indication of how a decision-maker should approach issues of viability, not least because the criteria for referral to the District Valuer are not specified.

26. The following changes are sought, as set out in our previous representations on this matter:

- Amend wording of paragraph 5.93 as follows: *"The parties ~~would~~ may agree to rely upon the conclusions of an independent assessor ~~the District Valuer~~ for the purposes of the application"*
- Replace 4<sup>th</sup> paragraph of Policy 8 to read: *"In exceptional circumstances where it is demonstrated to the Council's satisfaction through an independent 'open book' assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted."*

**4.14 Is the affordable rent/intermediate housing split justified and in line with current evidence and is it reasonable for the Council to seek the provision of social rented housing in some circumstances (paragraph 5.105)?**

27. In order to reflect the wording of Policy 8, which indicates that 'affordable rent and/or social rented' is acceptable, a change to the wording of paragraph 5.105 should be considered as follows: '*... the Council ~~will seek~~ may request consideration is given to ...*'.

**4.15 Are the requirements of policy 9 too restrictive and unduly onerous? How would the Council exercise its discretion regarding the provision of market homes?**

28. No comment

**4.16 How do the Council define 'in-filling' (policy 7)?**

29. No comment

**4.17 Has the Council properly addressed the housing needs of the elderly and people with disabilities?**

30. Yes, this is addressed within Policy 7.

**4.18 Is the Council providing sufficient support for people wishing to build their own homes?**

31. No comment

**4.19 Has the Council satisfactorily considered the relationship between housing provision and employment trends (PPG paragraph 018 under Housing and Economic Development Needs Assessments)?**

32. As noted in our response to question 4.4, our previous representations have noted concerns about the extent to which economic factors have been factored into the SHMA, and we have therefore suggested that housing provision based on the projected household change should be considered a minimum.

**4.20 Is policy 26 on sites for gypsies and travellers clear and consistent with national guidance and does it establish appropriate and reasonable criteria?**

33. No comment