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NORTH DORSET LOCAL PLAN REVIEW

Issues and Options Consultation

27 November 2017 to 22 January 2018

Response Form

As part of the Local Plan Review (LPR), North Dorset District Council has prepared an Issues and Options Document for consultation. The Issues and Options Document, the Sustainability Appraisal and associated documents can be viewed online via:

<https://www.dorsetforyou.gov.uk/planning/north-dorset/planning-policy>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, DT1 1UZ

Deadline: 5pm on 22 January 2018. 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**. By submitting this response form you consent to your information being disclosed to third parties for this purpose. Personal details will not be visible on our website, although they will be shown on paper copies that will be available for inspection by members of the public and other interested parties.

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

Personal Details*		Agent's Details (if applicable)*
Title	Mr	Mr
First Name	Paul	Stephen
Last Name	Crocker	Clark
Job Title(<i>where</i>)	n/a	Associate
Organisation (<i>where relevant</i>)	P and D Crocker	Savills
Address		████████████████████
Postcode		██████
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Email Address		████████████████████

Part B – Representations

Please answer as many questions or as few questions as you wish. There is a box at the end of the form where you can provide any comments that you may have.

Housing

1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

Yes

No

If you have answered 'No' please set out an alternative housing figure and provide reasoning to support your answer.

In general P and D Crocker support the Council's approach to progressing the Local Plan Review based on what we also consider to be the most appropriate housing need figure of 366 dwellings a year as set out in the new methodology from the Government's consultation proposals on Planning for the right homes in the right places. We do however have a number of comments in respect of housing numbers required in the District of North Dorset that should be taken into account when considering the spatial strategy that is required to deliver this significant level of housing. Please see the accompanying report which sets out the full representation to the North Dorset Local Plan Review Issues and Options Consultation (November 2017).

Employment

2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?

Yes

No

3. Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?

Yes

No

Spatial Strategy

4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

Yes

No

5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

Yes

No

If you have answered 'Yes' please set out your alternative spatial strategy and provide reasoning to support it.

P and D Crocker do not consider that the current spatial strategy in LPP1 or the amendment to include limited growth at Stalbridge will result in a significant enough change to spatial distribution to meet such substantial increases in the housing requirements across the District or the rate at which they will need to be delivered. We consider that a spatial strategy that focuses some strategic development towards Stalbridge and the 18 larger villages alongside larger strategic allocations around the 4 main settlements is essential to meet the increased housing requirements and high delivery rates. Please see the accompanying report which sets out the full representation to the North Dorset Local Plan Review Issues and Options Consultation (November 2017).

Blandford (Forum and St Mary)

6. Do you agree with the conclusions regarding the areas of search identified at Blandford?

Yes

No

7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

Please set out what you see as the additional infrastructure requirements.

Gillingham

9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

Yes

No

10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

Please set out what you see as the additional infrastructure requirements.

Shaftesbury

12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

Yes

No

13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

Please set out what you see as the additional infrastructure requirements.

Sturminster Newton

15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Yes

No

16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

Please set out what you see as the additional infrastructure requirements.

Stalbridge

18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Yes

No

19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

Yes

No

If you have answered 'Yes' please set out what you see as the further issues.

20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

Please set out what you see as the additional infrastructure requirements.

The Villages

21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

Yes

No

If you have answered 'No' please set out your alternative approach and information/reasoning behind this.

In response to Q21, P and D Crocker do not agree with the proposed approach in relation to future development at the eighteen larger villages within the District. As set out elsewhere in these representations in respect of the Spatial Strategy it is considered that the larger villages should contribute towards meeting some strategic housing requirements of the District if the Local Plan Review is to progress with a strategy that is realistic, deliverable and sound.

P and D Crocker own land in the larger villages of Marnhull and Pimperne. These sites are presented as genuine and sustainable sites for allocation in an alternative spatial strategy that identifies some of the District's strategic needs being met in the larger villages. Allocation of these sites would contribute to a mix of available sites and locations that would be attractive to small and medium housebuilders presenting a realistic and deliverable solution.

Please see the accompanying report which sets out the full representation to the North Dorset Local Plan Review Issues and Options Consultation (November 2017).

Affordable Housing

22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

Yes

No

23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

Yes

No

24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

Yes

No

Self-Build and Custom-Build Housing

25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

Yes

No

a. Allowing serviced plots to come forward under the current development plan policies.

Yes

No

b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.

Yes

No

c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.

Yes

No

d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).

Yes

No

e. Identifying land in public ownership which would be sold only for self-build development.

Yes

No

f. The use of Local Development Orders to facilitate self-build development.

Yes

No

26. Are there any other approaches that could be used to meet the demand for self-build housing?

Yes

No

If you have answered 'Yes' please outline the other approaches which the Council could pursue.

In response to Q22, P and D Crocker fully support the removal of the maximum limit of 9 dwellings in Policy 9 of LPP1 for rural exceptions sites to allow larger schemes to come forward. The cap on the number of units is not necessary as the number of units permissible is predicated on an evidenced local need.

In response to Q24 we support the retention of the cross subsidy element contained within Policy 9 which enables market housing to be delivered where a viability case exists.

Please see the accompanying report which sets out the full representation to the North Dorset Local Plan Review Issues and Options Consultation (November 2017).

Ensuring the Vitality and Viability of Town Centres

27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

Yes

No

Important Open or Wooded Areas (IOWAs)

28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

Yes

No

The A350 Corridor

29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

Yes

No

Comments

If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.

Please see the accompanying report which sets out the P and D Crocker full representation to the North Dorset Local Plan Review Issues and Options Consultation (November 2017).

Do you wish to be contacted about future consultations relating to the Local Plan Review?

Yes

No

Signature: _____



Date: 22.01.2018

If submitting the form electronically, no signature is required.

When completed please send form to planningpolicy@north-dorset.gov.uk

Representations to the North Dorset Local Plan Review Issues and Options Consultation (November 2017)

**Submitted by Savills on behalf of P and
D Crocker**



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1. Introduction

- 1.1 The following comments are submitted on behalf of P and D Crocker in respect of their land interest in the larger villages of Marnhull and Pimperne, North Dorset. This representation is in response to the North Dorset Local Plan Review (LPR) Issues and Options Consultation and the associated Sustainability Appraisal (SA). The full representation comprises this report and the completed individual representation form.
- 1.2 P and D Crocker are the owners of sizeable land holdings within the villages of Marnhull and Pimperne of which most has previously been submitted and forms part of the Council's Strategic Housing Land Availability Assessment (SHLAA). We welcome the opportunity to comment on the LPR Issues and Options consultation and submit this representation as an indication that the land within their ownership is available for development purposes. We consider that the land is sustainably located and if allocated would make a valuable contribution towards meeting the significant increase in housing requirements across the district during the revised Local Plan period.

2. Overview

- 2.1 The focus of the LPR Issues and Options Consultation as set out in paragraph 1.5 is the amount of residential and employment development required over the revised plan period and where that future development should be located in the District. The LPR also picks up on several other matters but the fundamental issue is the increased housing requirements in the District and where these needs should be met.
- 2.2 Paragraph 1.7 of the LPR Issues and Options Consultation states *'It is also significant in the context of the Local Plan Review that NDDC has recently declared that due to circumstances beyond its control it is unable to demonstrate a five-year housing land supply.'* This statement is noteworthy in the context of this review as NDDC now has the ability to control its future by allocating land for development and amending its spatial strategy to one that is more realistic and deliverable. P and D Crocker believe that their land in Marnhull and Pimperne provides a valuable opportunity as smaller to medium sized housing allocations within two of the larger sustainable villages. Additional housing in Marnhull and Pimperne would contribute towards maintaining the viability of the villages and promote a balanced and deliverable spatial strategy. Smaller allocations of sites of this nature in the location of the larger villages will support NDDC in meeting its increased housing requirements at the higher rate of delivery ensuring that the LPR can stand up to the test of soundness.

3. Representation to Q1. Housing

- 3.1 In general P and D Crocker support the Council's approach to progressing the LPR based on what we also consider to be the most appropriate housing need figure of 366 dwellings a year as set out in the new methodology from the Government's consultation proposals on Planning for the right homes in the right places. We would however make the following comments in respect of housing numbers required in the District of North Dorset that should be taken into account when considering how this significant level of housing can be delivered.

- 3.2 The National Planning policy Framework (NPPF) advises that Local Planning Authorities should set out the strategic priorities for the area in the Local Plan and this should include strategic policies to deliver the homes and jobs needed in the area. Housing is an important consideration in plan making and is being driven forward as a major Government objective as evidenced by its ambitious targets to build 300,000 new homes a year and the publication of the Housing White Paper in February 2017 which highlights the critical need to boost the supply of housing. Planning for the right number of houses and adopting a strategy that will deliver the required level of housing is fundamental to the establishment of a sound plan.
- 3.3 The current local plan document is the North Dorset Local Plan Part 1 (LPP1) adopted in January 2016 which sets a target of providing at least 5,700 net additional homes in North Dorset over a plan period that runs from 2011 to 2031. This requires housing delivery at a rate of 285 dwellings per annum. The Council was however committed to an immediate review by the Local Plan Inspector. Latest annual monitoring reports show of these 5,700 dwellings only 1,286 completions have been recorded representing a deficit of 424 dwellings over the 6 years since the monitoring of the plan period began. This leaves a requirement to deliver at least 4,414 dwellings before 2031 which would need a delivery rate of 315 dwellings per annum which has occurred only once in the last 12 years in North Dorset.
- 3.4 The persistent undersupply of housing in North Dorset resulted in the Council making a public statement on the 31st July 2017 that it could no longer demonstrate that it had a 5 year housing supply as required by the NPPF. In this statement the Council indicated its supply position had fallen to 3.42 years which was based upon the current adopted Local Plan target of 285 dwellings per annum and a 20% buffer applied for persistent under delivery as confirmed in the Council's Annual Monitoring Report (AMR) 2017. Based on the current 5 year supply any increase in overall housing numbers and annual requirements will result in a deterioration of the current housing supply and extend the period over which the Council will carry a deficit. It is therefore essential that NDDC takes the opportunity the LPR provides to consider how it can boost the supply of housing through its spatial strategy and planning policies.
- 3.5 The Local Plan Inspector committed NDDC to this LPR following the publication of the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA) towards the end of the examination of LPP1. The SHMA identified a housing requirement for North Dorset of 330 dwellings per annum. Since the publication of the SHMA the Government published its Housing White Paper followed by its consultation on Planning for the right homes in the right places in September 2017 which sets out its proposals to standardise the approach for assessing housing requirements.
- 3.6 Paragraph 3.10 of the LPR Issues and Options document indicates that *"On the basis of the standardised methodology that the Government is proposing, the housing need figure for North Dorset would be 366 dwellings a year."* Whilst this is not yet published policy the Government has shown clear intention to standardise the methodology based on household projections against affordability ratio in Spring 2018. It is therefore considered highly likely to become established policy in the near future.
- 3.7 P and D Crocker therefore support the approach of the LPR to plan for 366 dwellings per annum across the plan area. The alternatives of progressing with the lower figures set out in LPP1 or the SHMA would not meet the housing needs of the District which would place the emerging plan at risk of being found unsound.

- 3.8 We note with interest that whilst the LPR Issues and Options Consultation identifies the housing requirement figure it needs to plan for of 366 dwellings per annum, it does not translate this figure into an overall needs requirement for the plan period. The housing requirement of 366 dwellings per annum would see a need for 5,490 dwellings over a 15 year local plan period. To give an accurate reflection of the number of houses required under the LPR this figure also needs to be adjusted to take account of the 285 dwellings that were required during 2017/18 for which monitoring of completions has not yet occurred as well as the undersupply of 424 dwellings which has occurred during the years 2012 to 2017 of the current local plan period. When adjusting the figure NDDC needs to be planning for at least 6,199 new dwellings in the Local Plan Review period to 2033.
- 3.9 The NPPF is clear at paragraph 157 that *‘Crucially, Local Plans should be drawn up over an appropriate time scale, preferably a 15 year time horizon.’* Given the early stage of the LPR it is considered highly unlikely that the Local Plan will be adopted until at least the latter part of 2019, early 2020. Under such circumstances the Local Plan period should be extended to at least 2035 and possibly 2036 as suggested at paragraph 1.6 of the LPR Issues and Options Consultation document. The implications of the requirement to extend the Local Plan period is yet a further 3 years of housing requirement at 366 dwellings per annum. This would result in NDDC having to plan for 7,297 new homes under this LPR which represents an additional 2,883 new dwellings above the 4,414 still left to be delivered in LPP1 which are not currently accounted for.
- 3.10 The planned increase to housing requirements also needs to be considered in the context of its impact on the Council’s current housing supply. Savills has therefore considered the published statement by NDDC recognising a 3.42 years housing supply as well as the 2017 AMR to establish the number of homes that NDDC has identified as deliverable in the next 5 years as set out in the following calculation.
- 5 year Local Plan requirement: $5 \text{ years} \times 285 \text{ dwellings} = 1425 \text{ dwellings}$
 - + deficit against LPP1 requirements: $1425 + 424 = 1849 \text{ dwellings}$
 - + 20% for persistent under delivery: $1849 + 20\% = 2219 \text{ dwellings}$
 - Annual housing requirement over the next 5 years: $2219 \div 5 = 444 \text{ dwellings per year}$
 - NDDC’s deliverable housing in the next 5 years: $444 \times 3.42 = 1518 \text{ dwellings}$
- 3.11 Having established the number of homes identified as deliverable in NDDC’s supply it is now possible to consider the implications of the increased LPR housing requirement on the Council’s 5 year housing supply position.
- Local Plan Review requirement: $5 \text{ years} \times 366 \text{ dwellings} = 1830 \text{ dwellings}$
 - + deficit against LPP1 requirements: $1830 + 424 = 2254 \text{ dwellings}$
 - + 20% for persistent under delivery: $2254 + 20\% = 2705 \text{ dwellings}$
 - Annual housing requirement over the next 5 years: $2705 \div 5 = 541 \text{ dwellings per year}$

- NDDC's updated 5 year housing supply: $1518 \div 541 = 2.8$ years
- 3.12 The analysis shows that the increased housing requirements within the LPR have a significant impact on the housing supply requiring the delivery of 541 dwellings a year, a rate which has only been achieved twice in 17 years since the year 2000. The rate is more than 300 additional units above the average rate of completions achieved over the last 6 years and is considered unachievable under the currently adopted spatial strategy. If NDDC maintains its current spatial strategy to housing development we consider it is highly likely that the Council will not re-establish a robust 5 year housing supply position over the course of the entire LPR period. Furthermore we consider that the LPR would be challengeable under the tests of soundness.
- 3.13 Supply and delivery of housing is critical in the context of the NPPF to ensure that NDDC maintains control over decision making. The NPPF clarifies at paragraph 49 that *'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.'* The Council is already struggling to meet the lower housing requirement of 285 dwellings per annum contained within the adopted Local Plan. The LPR is a genuine opportunity to consider how NDDC can realistically deliver and meet the housing needs of the District but it will require a fundamental change to its spatial strategy for delivery to achieve its targets. If this opportunity is not taken there is a serious risk that the Council will remain in deficit in its 5 year housing supply, the housing policies will remain out of date in the context of the NPPF and the Council will have less control over where development takes place in the decision making process.

4. Representation to Q4. and Q5. Spatial Strategy

- 4.1 P and D Crocker do not consider that the current spatial strategy in LPP1 or the amendment to include limited growth at Stalbridge will result in a significant enough change to spatial distribution to meet such substantial increases in the housing requirements across the District or the rate at which they will need to be delivered.
- 4.2 Paragraph 5.9 of the LPR recognises that *'An essential part of the Local Plan Review (LPR) will be to consider whether the need figure of 366 dwellings a year can be met within the plan area (North Dorset) and whether the existing spatial strategy is the most appropriate strategy for meeting this figure.'* The SA states at 5.1.6 that given the potential need to provide additional housing the LPR will consider amending the spatial strategy which is implicit in recognising the existing spatial strategy will not meet those increased needs.
- 4.3 Evidence of housing delivery over the current local plan period shows that the existing spatial strategy of directing development solely to the market towns has not delivered the needs of the District. This is not expected to change simply by allocating more strategic scale land around the market towns. What is required is an analysis of past trends to understand how higher rates of delivery in the District have been achieved in the past.
- 4.4 In relation to North Dorset's historic housing supply, Savills has reviewed the patterns and distribution of housing delivery over the period 1994/95 to 2015/16 as set out in the Council's Annual Monitoring Reports.

- 4.5 During the period 1994/5 to 2004/5 North Dorset delivered an average of 381 dwellings per annum. This split down into 254 dwellings per annum being constructed in the 4 main towns and an average of 127 being provided in the rural areas, including rural conversions, agricultural workers dwellings and village allocations and windfalls. The figure of some 254 dwellings per annum comprised a combination of brownfield re-development, urban windfall and housing delivered on the allocated sites.
- 4.6 Allowing for a fairly vigorous windfall and conversion rate in the towns at the time attributable to the smaller local builders then working in the area this would suggest that the regional and national developers were unlikely to be relied upon to deliver in excess of 200 dwellings per annum for any extended period. This was against a context where housing requirements were to deliver 335 dwellings per annum and an expectation that this represented a ceiling rather than a target.
- 4.7 It is of note that during this period of healthy housing supply across North Dorset the planning gain context involved:
- Generally higher thresholds before affordable housing was sought, particularly in the towns;
 - generally lower proportions of affordable housing being sought, including the use of intermediate market products;
 - the presence of public subsidy to deliver affordable housing, and
 - a tariff based approach to community infrastructure payments set at around £2,000 per urban dwelling, and £500 per rural dwelling.
- 4.8 This range of influencing factors suggests that there was greater scope to deliver a range of housing outcomes during the period to 2004/5 than is the case today with fewer defined settlements, the potential emergence of CIL and in urban settings lower thresholds for affordable housing.
- 4.9 It is of note that the rural housing supply still managed to deliver a significant proportion of affordable housing within the context set out above. See Table 1 below.

Location	Total housing numbers	Affordable housing	%
Blandford	1027	207	20
Rural areas	1410	256	18
Shaftesbury	463	73	16
Sturminster Newton	445	60	13
Gillingham	1391	107	8

Table 1: Housing 1994/05 – 2004/05 (Source 2005 AMR Tables LI(iv) & NCOI 2d.)

- 4.10 Within this context, the delivery of rural housing can be seen to also unlock a steady supply of smaller affordable sites, enabling affordable housing management to achieve better “fit” between housing coming forward and local need that would be the case where larger developments are releasing larger blocks of affordable housing in single tranches, with the consequent risk that this floods the contemporary market and reduces the qualitative value of allocations.

- 4.11 It is also of note that (i) at the time that North Dorset was delivering an average of 127 dwellings per annum in the rural areas, it had some 52 villages with defined settlement boundaries compared to the 18 in the current Plan, and (ii) the range of housing site opportunities meant that North Dorset had a healthy small local builder sector, complementing the delivery on larger sites by the regional and national businesses.
- 4.12 In the subsequent 11 year period (2005/06 – 2015/16 inclusive) North Dorset introduced measures to manage housing supply in line with the prevailing national policies in place at the time. Towards the end of this 11 year period the Council adopted a Local Plan in 2016 which focused new allocations at the 4 larger towns only. Over this period (2005/16 – 2015/16) housing supply averaged 257 dwellings per annum, a fall of some 124 dwellings per annum compared to the previous 11 year accounting period used above.
- 4.13 This trend is falsely enhanced by the inclusion of 555 dwelling completions in 2005/06, a delivery that reflected the earlier levels of supply and pre-dated the housing supply management measures introduced by the Council. Without this contribution, the most recent 10 year average housing delivery rate equates to 228 dwellings per annum. It is of note that this figure of 228 dwellings per annum reflects the combined delivery by national, regional and small / medium builder model.
- 4.14 Given these figures, it can be clearly seen that over a 22 year period, with occasional exceptions when national developers were delivering concurrently in Gillingham, Sturminster Newton and Blandford, the regional and national delivery model cannot be relied upon to regularly deliver more than 150 – 200 dwellings in any single year within the North Dorset housing market, and over the most recent years significantly fewer than this relatively conservative range.
- 4.15 Over this same 2004/05 – 2015/16 period, the level of delivery by the SME builder sector has fallen considerably due to a number of factors, including:
- The introduction of housing supply management which favoured the delivery of larger sites capable of delivering higher levels of affordable housing which were seen as a priority that outweighed the prerogative to manage supply within a “ceiling”;
 - the lack of wider geographic coverage or resilience allowing such SME builders to readily target new geographic markets;
 - the ongoing combination of larger builders combining into fewer and more powerful entities with fixed supply chains, and
 - the development of a planning strategy that focused upon larger allocations and relies upon neighbourhood planning to plug the gaps.
- 4.16 The lack of a complementary smaller builder sector means that North Dorset is not only now heavily reliant upon the more limited regional and national operators to deliver housing, it has, through the approach of its 2016 Plan developed a housing delivery strategy which offers only limited opportunities to encourage the SME sector to return to the District.

- 4.17 In the 5 years recording of rural housing delivery from the 2011/12 AMR to the 2015/16 AMR recording year, average rural housing delivery has been 39 dwellings per annum, a figure considerably boosted by the 2015/16 year with 80 dwellings being completed including completions on 2 larger sites which are again a legacy of the policies within the 2003 Local Plan.
- 4.18 At a time therefore when North Dorset needs to respond to the challenge of increasing housing supply by some 28% from 285 dwellings per annum to 366 dwellings per annum, the evidence of consistent national and regional developer site build out rates across the District at between 150 – 200 dwellings per annum requires a paradigm shift in either the larger developer's appetite for development in North Dorset increasing, or in the Council's reliance upon large site allocations to deliver the necessary additional housing supply.
- 4.19 In relation to the underlying approach of identifying areas of search only around the main settlements and potentially Stalbridge, the LPR does express a brief comment about its ongoing avoidance of re-visiting the villages for planned growth, noting at paragraph 5.14:
- “for example in the past housing development in the rural areas of the district significantly exceeded planned rates and in some cases had a negative impact on the character and appearance of settlements, yet did not always enable rural facilities to be retained or enhanced.”*
- 4.20 It should be noted in relation to this comment that the framework against which the 2003 – 2011 Local Plan was considered by the then DCLG was one where housing figures represented a ceiling rather than a target to achieve and exceed. Indeed exceeding supply rates was something to be restricted. It is additionally considered that housing supply in sustainable rural locations cannot be seen as an intrinsically unhealthy outcome unless the scale of development is significantly at odds with the scale of the particular settlement.
- 4.21 If development in the past had a negative impact upon local character, this is not a reason not to enable future development in villages; the challenge is for decision makers to ensure the development they allocate and permit is of a scale and form that serves to support and enhance local character.
- 4.22 The capacity of rural housing schemes that are relatively modest in the wider context cannot be expected to be the absolute difference between the retention and loss of social infrastructure. Decisions for instance about the retention of post offices are often made on the basis of geographic spread, not relatively minor changes in each post offices hinterland. Likewise village pubs are more dependent upon wider market changes and consumer decisions about alcohol pricing than whether a particular village does or doesn't attract 40-50 dwellings over a particular period.
- 4.23 Approaches taken by Education Authorities to the closure, amalgamation or consolidation of primary school are again a function of the Education Authorities ability to finance an unchanged service rather more than it is a reflection of the number of primary aged pupils resulting from a particular housing development.
- 4.24 Table 2 below sets out the 2011 Census data regarding population and households in the 18 villages (excluding Stalbridge) considered to comprise sustainable locations together with an assessment of housing delivery over the 1994/95 – 2004/05 and the 2005/06-2015/16 years to identify relative increase in scale of settlements and their current sustainability: (Note housing numbers are rounded to the nearest 5)

NDDC Local Plan Review Issues and Options Consultation

Representation



Village	Population	Households	1994/5-2004/05	2005/06-2015/16	Total
Bourton	1894	826	30	70*	100
Charlton Marshall	1163	492	50	40**	90
Child Okeford	1112	503	30	20	50
East Stour	597	251		5	5
Fontmell Magna	734	319	25	10	35
Hazelbury Bryan	1090	454	80	10	90
Iwerne Minster	950	298	30	25	55
Marnhull	1948	905	20	30	50
Milborne St Andrew	1062	472	85	10	95
Milton Abbas	730	232	5	10	15
Motcombe	1405	564	10	55	65
Okeford Fitzpaine	958	380	30	55	85
Pimperne	1071	478	30	15	45
Shillingstone	1168	479	20	55	75
Stourpaine	619	265	10	5	15
Winterborne Kingston	693	282	23	30	53
Winterborne Stickland	516	280	15	10	25
Winterborne Whitechurch	710	331	30	5	35

Table 2 village scale and housing development numbers

* Includes Rugby Cottage and Bourton Mill, both under construction

** includes Church Lane, under construction

- 4.25 The table does not include permissions granted but not implemented or other dwellings created outside the settlement boundary through conversion or agricultural worker dwellings.
- 4.26 The group of 18 villages include a wide range of community sizes and facilities with a population range between 516 to 1,948. Even allowing for the mix in date ranges with the Census recording the village size in household numbers some 75% of the way through the 22 year period for which housing growth is noted, it can be seen that a number of the communities have increased in household size by between 15 – 25%.
- 4.27 Therefore, whilst housing growth has not necessarily led to the retention of all village facilities, there is a linkage demonstrated above between housing growth and the relevant communities remaining sustainable as confirmed by the Council's decision that these communities remain, in principle, capable of accommodating further housing.
- 4.28 As drafted, the LPR Issues and Options consultation relies upon Neighbourhood Planning to lead in identifying locations for additional growth, however since 2012 in North Dorset this process has a very slow lead in period with only the Shillingstone Neighbourhood Plan passing referendum and allocating sites for 40 dwellings. The Bourton Plan, which is awaiting referendum allocates no new housing sites, relying instead upon extant planning permissions. The Blandford + Neighbourhood Plan remains the subject of ongoing negotiations between Town and District Council over the issue of housing delivery strategy.
- 4.29 Given the limited number of sites being brought forward through the Neighbourhood Plan process, taken with the Issues and Options consultation approach of seeking further large allocations (only) there is limited

scope for North Dorset to encourage the Small and Medium Housebuilder sector to either grow or extend into North Dorset.

4.30 The HBF Report “Reversing the Decline of Small Housebuilders” (HBF January 2017) notes the decline in this sector, which was contributing 25% of all new housing in 1988 but only 12% today within an environment of increasing housing site allocation sizes that are increasingly out of reach to smaller builders.

4.31 More recently, the Secretary of State, Sajid Javid’s speech to the Federation of Master Builders on 12th December 2017 noted:

“To fix the market, we’re going to have to create at least 300,000 homes each year. And small and medium-sized builders are going to have big role to play in making that happen. Our [housing white paper](#) was very clear on this. Ever since the recession, the market has been dominated by a handful of very large developers. It used to be the case that more than 60% of new homes were delivered by small firms. Today the figure is half that, and that’s a tragedy. I want to turn that around, to see more of you building more homes. And we’re backing that with more funding – an additional £1.5 billion of short-term loan finance for SMEs, custom builders and innovators announced in the Budget. We’re doing this because smaller firms are skilled at developing small sites, great at building out quickly, and have a strong track record of innovation.”

4.32 Given this clear national steer, taken with the track record within North Dorset wherein the larger builders can clearly be seen to represent only a part of the housing delivery solution, the suggested strategy relying upon larger urban edge sites for the bulk of additional housing requirements together with a clear break with previous delivery rates, North Dorset will need to promote a wider range of housing delivery solutions by size and location than are currently set out in the consultation document.

4.33 An alternative strategy to deliver a wider range of housing delivery solutions exists in the 18 larger villages which was excluded as an option in the SA, the conclusions of which are considered challengeable. The SA states at paragraph 1.4.7 that the LPR will consider allocating land at Stalbridge and the 18 larger villages and this is reinforced at paragraph 5.1.9 where the 3 alternative spatial strategies are presented. The SA then tests the alternative options against a set of sustainability objectives and following the conclusions of this test excludes option (C) that considers strategic development at the 18 larger villages.

4.34 Having considered the methodology of the SA set out in chapter 2 and the conclusions shown in the tables on page 24 and 64 as well as Appendix A of the SA (in reference to the spatial strategy and development in the villages) we make the following comments.

4.35 The conclusions on landscape that lead to a strong negative effect are based upon ‘*Development for housing and employment uses above the local need is likely to result in small scale villages significantly expanding, resulting in the urbanization of rural areas, including those in the AONBs*’. The larger villages that form part of the alternative strategy are by definition larger and retain settlement boundaries due to previous assessment by NDDC of their sustainability to accommodate additional development. Significant expansion and urbanization could be avoided by smaller modest allocations that support and respond to the character of these villages. Only 5 of the 18 larger villages are located in the designated AONB landscapes.

- 4.36 The SA considers landscape impact on strategies A and B of focusing development towards the 4 main settlements and Stalbridge as having a negative effect but not a strong negative effect. Appendix A clarifies that this conclusion is reached based upon development that may affect the AONBs and local landscape features. The SA then considers the landscape impact of a strategy that focuses development on the 18 villages as strong negative effect. When considering that the majority of these villages fall beyond AONB landscape designations the differences between the conclusions on landscape in the SA between the strategies are irrational. Based on these comments we consider that the strong negative effect attributed to Landscape for spatial strategy C is overestimated in the SA.
- 4.37 The conclusions in respect of the Historic Environment again show strong negative effects. Whilst we acknowledge that many of the villages have designated conservation areas and listed buildings within their boundaries so to do the towns. Carrying out a site search that leads to a sensible approach to allocation and with sensitive design, significant effects on the historic environment could be avoided. Again the effect on the SA is significantly overestimated.
- 4.38 The Community objective is shown as strong negative effect based on an assumption that future occupiers would be unable to access the full range of services and facilities locally, by sustainable modes of transport and may result in rural isolation. Many of the larger villages have a number of existing facilities where daily needs can be met. Furthermore, no weight or consideration appears to be given to the ability of new development to support existing thriving rural communities and existing services in villages. The SA fails at this stage to recognize the importance in paragraph 55 of the NPPF of enhancing and maintaining the vitality of rural communities and supporting village facilities and services.
- 4.39 The SA has finally overlooked the positive contribution that housing in the larger villages could make to supporting the rural economy. There are a number of existing employment sites and employment areas in the rural parts of North Dorset beyond the market towns. Page 18 of the LPR consultation document indicates under Economic Issues that *'the ageing population means that a high proportion of the labour force is nearing retirement age and there is likely to be a significant shortfall in labour supply by 2024.'* Providing housing in rural areas will assist in providing additional labour for existing businesses in the rural parts of the district in the future.
- 4.40 We consider that option C should not score Strong negative effects for community or the economy. It is argued that the positive effects have not been considered and that these sustainability objectives should have scored a positive impact but at the very least neutral and not Strong Negative effect as presented in the SA which erroneously discards this alternative spatial strategy from further consideration in the LPR Issue and Options Consultation.
- 4.41 The contribution that smaller allocations in the larger villages could make to a sustainable and deliverable spatial strategy is fundamentally being overlooked by the judgements being made in respect of the impact that larger scale development would have in these locations. The positive attributes of smaller housing allocations in the larger villages have also not been considered within the SA which has significantly skewed the assessment into strong negative effects preventing this more realistic and deliverable strategy from being considered further.

- 4.42 Proceeding with the currently adopted spatial strategy or one that includes some development in Stalbridge is not considered likely to deliver the housing numbers required and is not considered sound. The NPPG requires reasonable alternatives to be realistic and deliverable. The current strategy of focusing development at the market towns is failing to deliver the housing requirements of the District as evidenced by the continuous undersupply for the last 6 years. The strategy of continuing to focus more allocations in these towns where the housing is not being delivered at the necessary rate considered in the context of 20 years of evidence of national and regional housebuilders contributing approximately 150-200 dwellings a year is not considered a realistic or deliverable alternative. The strategy of additional allocations around the market towns and Stalbridge needs to be supplemented with smaller allocations around the larger villages such as Marnhull and Pimperne to provide a range of housing options across the District and stimulate growth of the small and medium housebuilder sector.
- 4.43 It is considered that areas of search around the larger villages should have also formed part of the Council's consultation exercise as a legitimate alternative. A spatial strategy that considers a proportionate allocation of development that supports and responds to the character of the larger villages should be considered as a realistic and deliverable alternative. Instead of proceeding to preferred options following this consultation exercise a further round of public consultation should be completed before, and separate to, the Regulation 19 consultation. This should consider an alternative strategy which includes the larger villages that will deliver the housing required across the District and provide a range of housing solutions and re-open the market to small and medium scale housebuilders.
- 4.44 Allocation of additional housing solely around the market towns will not solve the Council's inability to deliver houses at the rate that is required. Only a revision to the spatial strategy which supplements additional allocations in the market towns and Stalbridge with smaller allocations around the larger villages will open new opportunities in the District for SME's and MME's which will increase the rate of delivery and the Council's 5 year housing supply.
- 4.45 To meet the significant increase in housing requirement and the needs of the district the Council should strongly consider a revision to its spatial strategy and approach when it has the ability to influence where development should be located. Continuing with a failing strategy will only see continued failure to deliver the housing required in the district, a continuation of a lack of 5 year housing supply and continued risk of speculative housing developments in areas where the Council has no control.

5. Representation to Q21. The Villages

- 5.1 In response to Q21, P and D Crocker do not agree with the proposed approach in relation to future development at the eighteen larger villages within the District. As set out elsewhere in this representation in respect of the Spatial Strategy it is considered that the larger villages should contribute towards meeting some strategic housing requirements of the District if the LPR is to progress with a strategy that is realistic, deliverable and sound.
- 5.2 Paragraph 11.1 of the LPR Issues and Options Consultation recognises the rural character of North Dorset and identifies that there are a substantial number of villages in the District, 18 of which are defined as larger villages. The existing spatial strategy seeks to focus growth at the four main market towns and

permits only local need growth in the larger villages. Paragraphs 11.6 and 11.7 indicate that it is not currently proposed to change the existing spatial strategy approach with larger villages meeting local rather than strategic needs.

- 5.3 Reference to the villages is also made in chapter 11 of the SA. It indicates at 11.0.2 that there are a substantial number of villages and 18 of these villages are larger villages. What the SA does not indicate is that these larger villages were identified and designated in NDDC's evidence base to LPP1 having considered the sustainability hierarchy of settlements in North Dorset. The larger villages were designated following consideration of the settlement size and facilities/services in the village and concluded that they were capable of accommodating future development based upon their sustainability.
- 5.4 We are of the opinion that NDDC should consider an alternative approach of making small to medium sized allocations in the larger villages that will supplement the identification of larger additional allocations around the market towns and Stalbridge. Applying a very simplistic allocation of 15% growth to all of the larger villages (as shown in table 3 below) would see a contribution of 1,124 dwellings to the supply of housing in the District over the LPR period. This would represent a 39% contribution towards the additional 2,883 dwellings required across the District up to 2036. This would still leave a substantial number of additional dwellings (1,759) required across the market towns and Stalbridge.

Village	Households	Allocations representing 15% increase
Bourton	826	124
Charlton Marshall	492	74
Child Okeford	503	75
East Stour	251	38
Fontmell Magna	319	48
Hazelbury Bryan	454	68
Iwerne Minster	298	45
Marnhull	905	136
Milborne St Andrew	472	71
Milton Abbas	232	35
Motcombe	564	85
Okeford Fitzpaine	380	57
Pimperne	478	72
Shillingstone	479	72
Stourpaine	265	40
Winterborne Kingston	282	42
Winterborne Stickland	280	42
Winterborne Whitechurch	331	50
Total		1,124

Table 3 Allocations if 15% growth of larger villages formed part of the spatial strategy

- 5.5 Planning for the level of growth set out above in the larger villages would deliver a valuable contribution to the increased housing requirements of the District. It is also considered that the level of growth set out above could be planned sensitively to respect the character and scale of the existing villages avoiding the strong negative effects that are suggested to landscape and the historic environment in the SA.

- 5.6 As stated previously, P and D Crocker own land in Marnhull and Pimperne which is located immediately adjacent to the existing retained settlement boundaries. The sites that fall within the ownership of P and D Crocker are located in sustainable locations and are considered to represent significant opportunity for allocation. They would contribute to a mix of available sites and locations that would be attractive to small and medium housebuilders. The land submitted as part of this representation as being available for residential development is identified in Appendix A. The sites are shown as extracts from the Dorset Explorer SHLAA layer. The sites in Marnhull consist of:
- Land at Tanzey Lane and Salisbury Street – SHLAA Site Reference Number 2/37/0394 – Capacity for approximately 85 dwellings.
 - Land off Butts Close – SHLAA Site Reference Number 2/37/0395 – Capacity for approximately 80 dwellings.
 - Homefield (Land off Burton Street) – SHLAA Site Reference Number 2/37/0396 – Capacity for approximately 75 dwellings.
 - Land between Burton Street, Church Hill and Sackmore Lane – SHLAA Site Reference Number 2/37/0397 – Capacity for approximately 550 dwellings
- 5.7 The sites in Pimperne consist of:
- Hyde South of Salisbury Road – SHLAA Site Reference Number 2/43/0391 – Capacity for approximately 35 dwellings.
 - Chase East of Salisbury Road – SHLAA Site Reference Number 2/43/0393 – Capacity for approximately 30 dwellings.
- 5.8 P and D Crocker is already considering the development potential of these sites and is in the process of producing illustrative masterplans that demonstrate that the sites can be developed sensitively and respond positively to the character of the villages in which they are located.
- 5.9 All of the sites in Marnhull are located on the edge of the existing settlement boundary and will be viewed in the context of existing built form thereby minimising wider landscape impacts. There is no landscape designation in or near to Marnhull and therefore with appropriate additional planting, landscape is not considered a constraint to development around the settlement. The sites are centrally located close to the existing village facilities and services. All of the sites fall beyond the designated conservation area and the setting of nearby listed buildings can be safeguarded through a sensitive design process. Access is also achievable from each site onto the transport network which comfortably has the capacity to accommodate the additional traffic generated. Marnhull is the largest village in North Dorset with over 900 households, is well served by local facilities and has sustainable access to Sturminster Newton less than 3 miles to the south. To not consider additional growth in Marnhull would be missing a wholly sustainable solution to meeting some of the District's housing requirements over the plan period.

- 5.10 The land in ownership of P and D Crocker in Pimperne consists of land to the south and east of Hyde Farm. This land has not been included as a housing allocation within the Pimperne Neighbourhood Plan due to concerns regarding landscape impact and highway safety issues. We do not share these views as any development on these sites would be viewed against a back drop of rising land to the east and when viewed from across the valley would be seen in the context of the existing village and the A354 without affecting the rural character of the village. A sensitive design solution is achievable on these sites and taking them forward as allocations would assist in meeting the increased housing needs of the District in the future.
- 5.11 In respect to the crossing of the A354, local concerns regarding highway safety were not shared by the County Highway Authority who did not consider the impact to be severe. Nevertheless, there is scope to consider the provision of a pedestrian crossing over the A354 as off-site highway improvement works as part of any residential development proposal submitted in the future to address any significant highway impact.
- 5.12 We consider the sites in Pimperne should be considered as part of the LPR process and the wider spatial strategy to meeting the District's housing needs. Our representations to the Pimperne Neighbourhood Plan Regulation 14 consultation submitted in December 2017 are included at Appendix B in support of this representation to the LPR.
- 5.13 The sites in Marnhull and Pimperne are presented as genuine and sustainable sites for allocation in an alternative spatial strategy that identifies some of the District's strategic needs being met in the larger villages. Allocations of these sites would contribute to a mix of available sites and locations that would be attractive to small and medium housebuilders presenting a realistic and deliverable solution.
- 5.14 To exclude the larger villages in North Dorset from contributing towards some of the strategic housing needs is missing a sustainable and valuable opportunity of putting in place a spatial strategy that can achieve the housing requirements of the District. Providing relatively small scale growth across all of the larger villages will make a big contribution towards meeting the increasing housing requirements and provide a range of sites that are likely to encourage the small and medium housebuilders back into the District stimulating higher delivery rates.
- 5.15 The contrary argument to allocating sites in the villages is to rely upon the Neighbourhood Plan process to provide these allocations. The Neighbourhood Plan process is inherently slow as evidenced by the progress seen in Neighbourhood Planning across the District to date since 2012. Furthermore, the Neighbourhood Plan process will rarely seek to allocate sites of a suitable size that are required to be attractive to the small to medium sized housebuilders and therefore continuing to rely on this process in the larger villages will not realistically address the housing requirements or supply deficit.
- 5.16 We consider that it is necessary to consider an alternative approach to The Villages by applying search areas around the larger villages in the same way that is applied to the towns. The scope of this exercise should look to allocate at least a 15% increase in households in these larger villages to make a significant contribution to the strategic housing requirements of the District and provide the market with choice of a range of sites in terms of size and location.

6. Representation to Q22. and Q24. Affordable Housing

- 6.1 The issue of Affordable Housing is clearly one of importance that is intrinsically linked to the wider objective of the LPR to achieve higher housing delivery to meet the requirements of the district. The main scope of the review appears to aim at making the delivery of affordable housing on exceptions site permitted by Policy 9 of LPP1 more flexible. In response to Q22, P and D Crocker fully support the removal of the maximum limit of 9 dwellings in Policy 9 of LPP1 for rural exceptions sites to allow larger schemes to come forward. The cap on the number of units is not necessary as the number of units permissible is predicated on an evidenced local need.
- 6.2 In response to Q24 we support the retention of the cross subsidy element contained within Policy 9 which enables market housing to be delivered where a viability case exists.
- 6.3 The justification for the removal of the cross-subsidy element of the policy is based on seeking to maximise delivery of affordable housing. This proposed change is considered entirely unnecessary and could have the opposite effect of preventing some exceptions sites coming forward. As the policy is currently drafted the market housing is only permissible if an open book viability case has been made that it would not be possible to provide affordable housing without a market element and the number of market homes is the minimum necessary to deliver the affordable element.
- 6.4 Removal of the ability in the policy to cross subsidise affordable housing exception sites with market homes where viability is an issue could prevent some schemes from coming forward in the future due to viability issues. This would have the opposite outcome from the objective sought and could reduce the level of affordable housing delivered.

7. Conclusion and Summary

- 7.1 The Council is under serious pressure to deliver significantly higher housing numbers across the District at a time where it is carrying a high 5 year housing supply deficit. Continuing with the LPR with a spatial strategy that is failing currently or with only small changes to include Stalbridge will not deliver the housing needs of the District.
- 7.2 To address the existing 5 year housing supply shortfall and plan for the significantly higher housing requirements of the District the Council should be considering the allocation of a wide range of sites of variable size and location to include larger villages that will enable the market to deliver. Considering a wider spatial approach to development will create opportunity for a wider range of housebuilders to enter the market and will not cause the strong negative effects alleged if planned sensitively.
- 7.3 This is NDDC's opportunity to allocate sites that it would prefer to see developed with the benefit of public consultation. In the absence of a change in strategy, delivery rates are likely to remain lower than required, the Council will remain in a 5 year housing supply deficit and be exposed to speculative applications that it is less able to influence in the decision making process.



7.4 We believe that P and D Crocker's land in Marnhull and Pimperne can provide several sensitive allocations within the larger villages that can support a sustainable and realistic alternative strategy to housing delivery in North Dorset.

Cc: Client

Enc: Individual representation forms



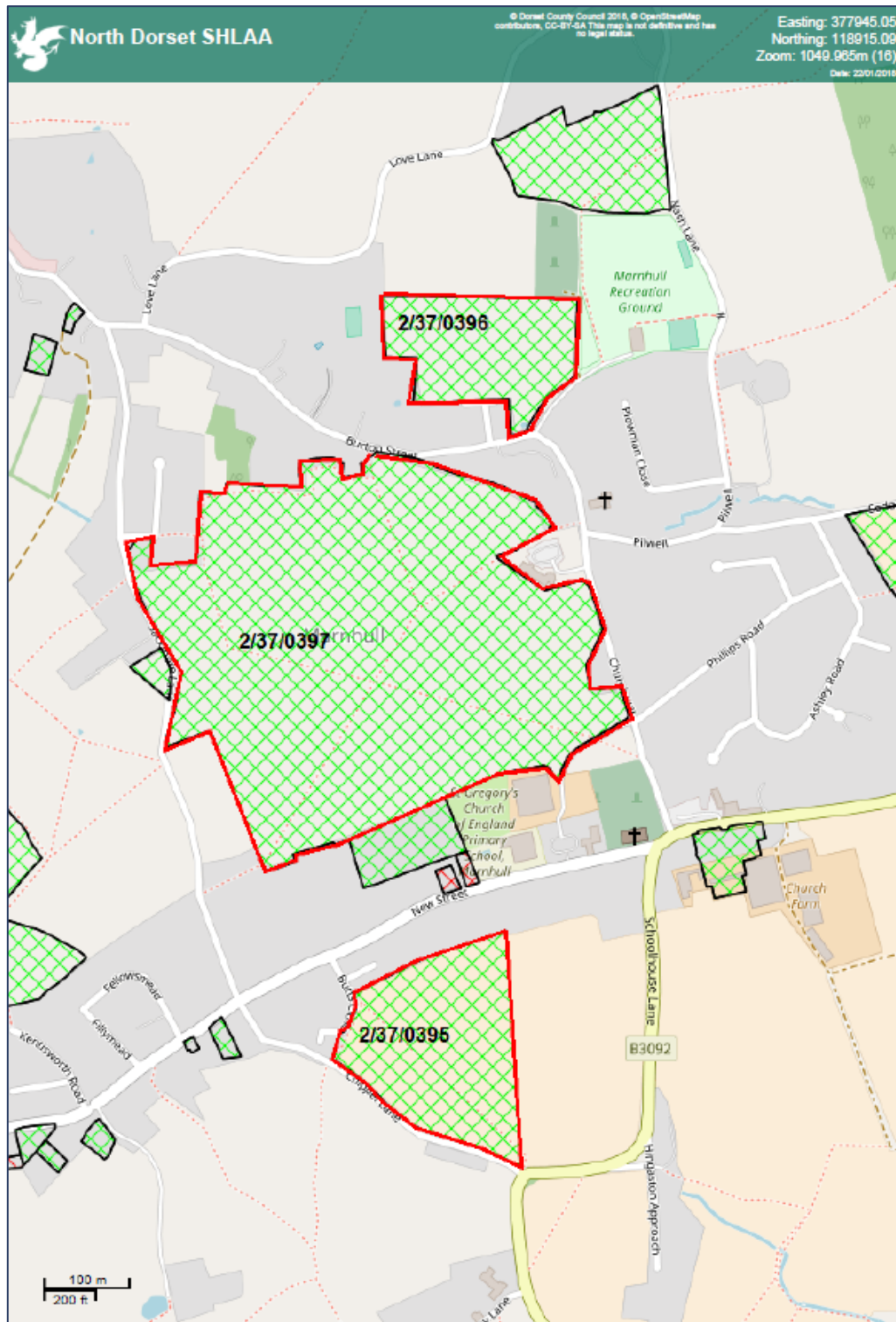
Appendices



Appendix A
Sites Submitted – Marnhull and Pimperne

NDDC Local Plan Review Issues and Options Consultation

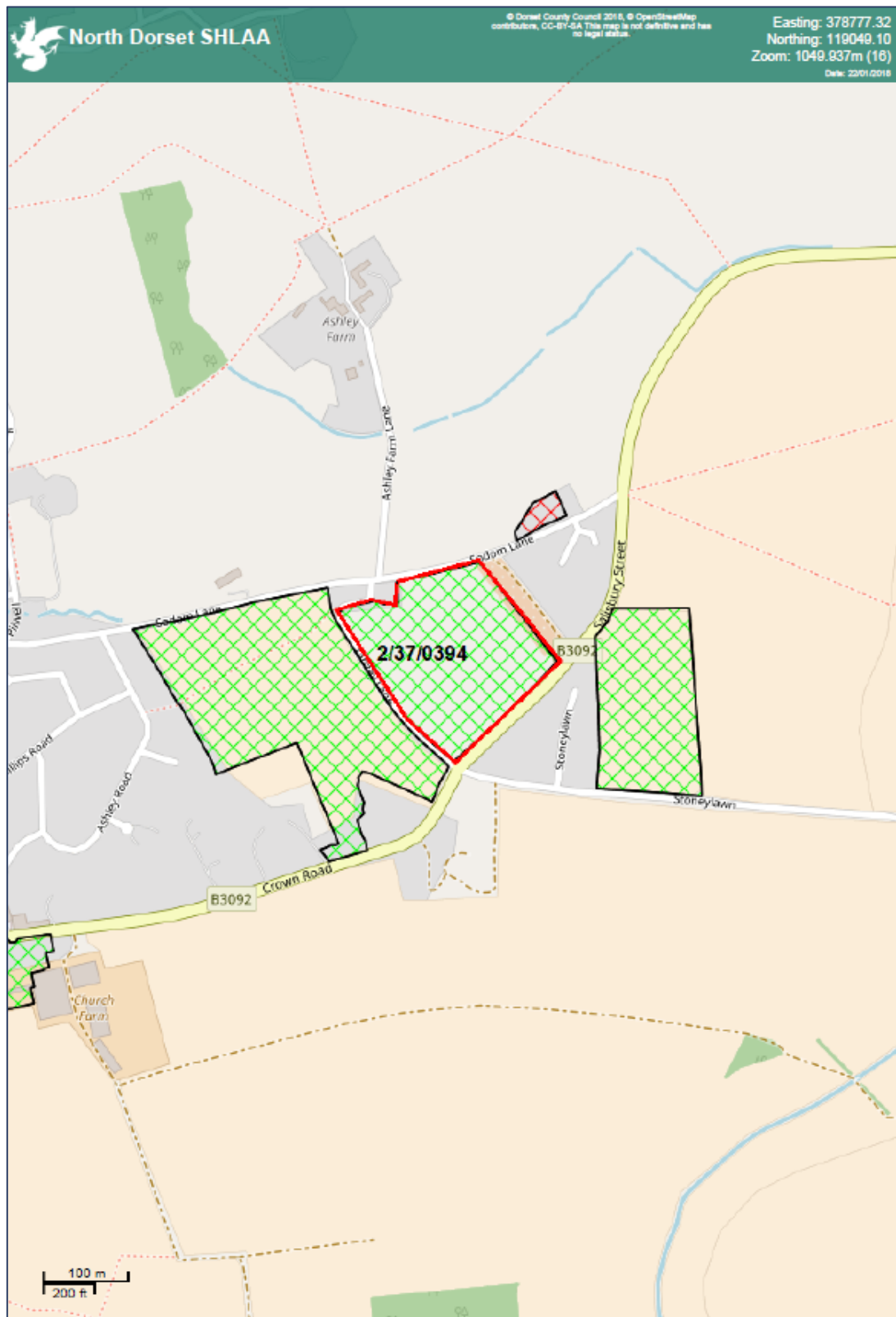
Representation



Appendix A: Marnhull Sites

NDDC Local Plan Review Issues and Options Consultation

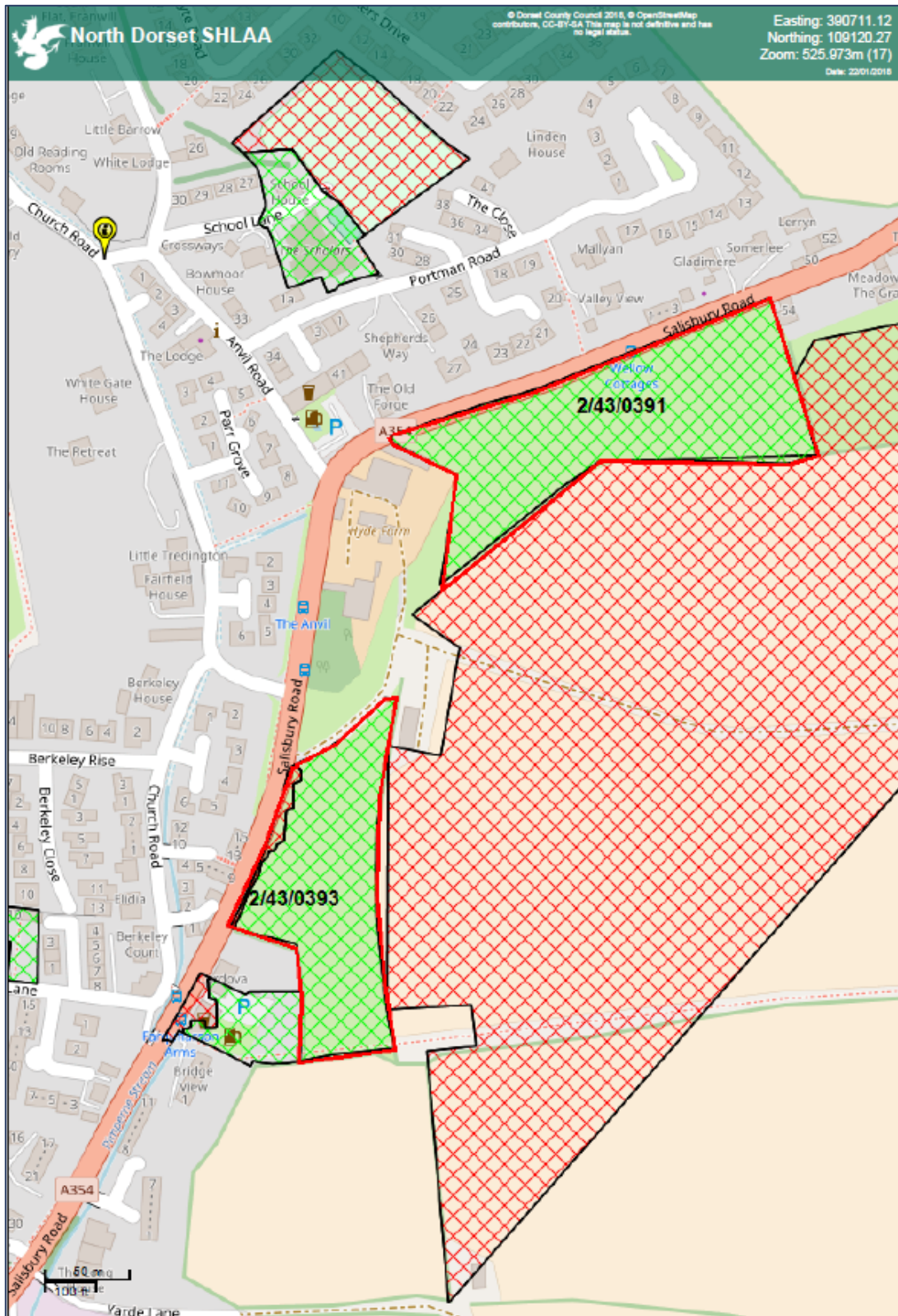
Representation



Appendix A: Marnhull Sites

NDDC Local Plan Review Issues and Options Consultation

Representation



Appendix A: Pimperne Sites



Appendix B
Representation to Pimperne Neighbourhood Plan
Regulation 14 Consultation



Appendix B: Pimperne Neighbourhood Plan Representation

21 December 2017

Pimperne Neighbourhood Plan Group
Pimperne Parish Council

Submitted by email: [REDACTED]

Steve Clark
[REDACTED]
[REDACTED]

Dear Sir/Madam

I am writing in response to your current Regulation 14 consultation on the pre-submission draft of the Pimperne Neighbourhood Plan. I act on behalf of P and D Crocker in representing their land interests at Hyde Fam, Pimperne.

This representation will respond specifically to the following sections of the draft plan:

- Timescales, plan period and future reviews
- Meeting housing needs
- Location for new housing development

Timescales, plan period and future reviews

The Neighbourhood Plan pre-submission draft sets out the period in which the plan intends to cover, stating that it will run through to 2031 in line with the current adopted North Dorset Local Plan Part 1 (LPP1). We are concerned that the proposed timescale for the plan does not cover a sufficient time period covering only 13 years if the plan is made in 2018 in accordance with the timescales set out on page 3 of the Plan.

Furthermore, the continued progress of the Neighbourhood Plan in advance of taking account of new housing evidence due to be considered by North Dorset District Council in its Local Plan Review would be premature and could result in a Neighbourhood Plan under examination that is based upon an out of date Local Plan and out of date housing figures.

North Dorset District Council adopted its current Local Plan in January 2016. LPP1 covers the period 2011-2031. The Council is currently undertaking a Local Plan Review at the recommendation of the Inspector who examined LPP1 due to a requirement to take account of new evidence including housing need evidence detailed in the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA).

In addition to the updated evidence in the 2015 SHMA, the Department for Communities and Local Government's recent consultation document 'Planning for the right homes in the right places: consultation proposals' would see North Dorset's housing requirements rise from 285 dwellings per annum in the current Local Plan to 366 dwellings per annum.

North Dorset District Council also publicly announced earlier this year that due to circumstances beyond the control of the Local Planning Authority it no longer has the 'five year housing land supply' that is essential in controlling planning applications that aren't in line with its adopted Local Plan. It acknowledged that the supply had fallen to 3.42 years and because of this reduced supply the national presumption in favour of sustainable development would apply. This announcement also rendered the housing policies in the adopted Local Plan 'out of date' as indicated by paragraph 49 of the National Planning Policy Framework.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.
[REDACTED]



The Council is at an early stage of the local plan review but nevertheless is planning for a significant increase in the number of houses it is required to deliver as a result of the new housing need methodology that could be imposed by central government in national policy as early as April 2018. We believe it would be inappropriate for the Neighbourhood Plan to proceed to submission based on housing figures that are in an out of date local plan and are likely to have increased significantly by the time the neighbourhood plan has been submitted for examination. For these reasons we are of the view that proceeding to submission with the Neighbourhood Plan as currently drafted in the timescales proposed could lead to significant problems in its examination process. It would be wiser to defer submission until the details of the new housing need methodology due to be imposed by central government next year are known and the implications of any increased housing requirement in North Dorset can be fully considered by the Neighbourhood Plan Group.

The Local Plan Review is looking at a new plan period running from 2013-2033 but in reality this is likely to be extended during the review period to 2036 to take account of the fact it is unlikely to be adopted before 2021 and the plan should cover a 15-year time horizon. It is suggested that the Neighbourhood Plan takes this opportunity to consider aligning with the plan period of North Dorset's Local Plan Review to 2033.

Meeting Housing Needs

The Neighbourhood Plan sets out on page 16 that *'the estimated housing need for Pimperne based on a 'pro-rata' proportion of the rural areas target in North Dorset Local Plan would be 39 dwellings for the period 2015-2031'* It is not clear from the Neighbourhood Plan whether the methodology of proportioning out on a pro-rata basis to the villages, the countryside target of 825 dwellings has been agreed. We do not consider the approach to dividing the local plan figure out on a pro-rata basis to be a sound approach to distributing development in the countryside.

The settlements in North Dorset beyond the four main market towns have a high degree of variation in their sustainability and therefore their ability to accommodate new development. Pimperne is one of the more sustainable and larger villages in North Dorset and therefore it is reasonable to expect that it would need to take a higher proportion of the countryside requirement.

The Local Plan Review and future housing requirement context explained above will see a marked increase in the number of houses required across the District. This will also translate into a higher requirement beyond the four main market towns and could even lead to a change in the spatial distribution of development at a strategic level. In any case, the number of homes required in Pimperne is expected to increase and therefore the Neighbourhood Plan should look to increase its housing needs in line with projected increases and allocate more sites to ensure that it can meet these needs.

The Neighbourhood Plan states in respect of Affordable Housing that *'Although in the Local Plan affordable housing can be built as exception sites outside the settlement boundary, it is anticipated that this should not be necessary as the need for such homes should be met on the development sites included in this Plan.'*

The principle of affordable housing exception sites is grounded in national policy in the NPPF as well as local policy. Therefore if it can be demonstrated that there is a local need for affordable housing and this can be delivered on a rural exceptions site the Neighbourhood Plan should not seek to preclude such delivery. It is noted that this statement is not translated into the housing needs policy MHN and therefore it is questionable whether it is even needed at all, particularly given the precedence the rural exception policy in the NPPF would have over the Neighbourhood Plan.

We object to the Neighbourhood Plan's approach to the preclusion of any housing development to the eastern side of the A354. The landscape setting and settlement form chapter notes that *'The A354 road is the main corridor of movement through the area. The road has been engineered to keep traffic flowing along this strategic route (and it is heavily trafficked). So although busy it does not act as the 'high street' but is more akin to a bypass, and the presence of farm buildings and fields fronting onto its eastern side reinforce this distinction. The AONB advisor noted that the green, west facing slopes along the main road are important in maintaining the rural character of that part of the village.'*



The land to the east has been excluded based on potential landscape impact on the AONB and the rural character it affords to the village. There is however already a degree of presence of built form to the east of the A354 which is historic and dates back more than 150 years. This built form in fact defines part of the historic character of Pimperne and some additional development on the eastern side of the road would reinforce the former ribbon pattern of the settlement that developed along the Salisbury Road.

Given the rising nature of the land to the east, the extent of development would be limited to the road frontage and therefore the visual impact on the AONB landscape would be limited with development set in the foreground of rising land behind. We are of the opinion that development to the east of the A354 could be designed in a sensitive manner to reflect the local distinctiveness of Pimperne with minimal intrusion to the quality of the AONB landscape. We suggest that additional opportunities on the eastern side of the A354 should be considered to meet the likely increase in the housing needs of the Parish and the Neighbourhood Plan presents the opportunity to review where this additional housing should be directed.

We object to the exclusion of any residential development opportunity to the east of the A354 and believe the approach to Policy MHN: Meeting Housing Needs should be amended to allocate additional sites for residential development in Pimperne to the east of the A354. This would assist with achieving the rising housing requirements in the District and additional opportunities that are designed sensitively are considered to the east of the A354.

Location for new housing development

P and D Crocker is disappointed that land to the south and east of Hyde Farm, Pimperne has been excluded from the Neighbourhood Plan allocations. It appears from the Pimperne Neighbourhood Plan Strategic Environmental Assessment – Options Stage Report that the sites have not been advanced primarily due to their visual impact on the AONB and concerns regarding crossing of the A354.

As stated above the character of Pimperne has historically seen built form on the eastern side of the A354. We would suggest that there is a solution to designing a quantum of development that would respect and reinforce the local character of Pimperne without causing harm to the AONB landscape. Any development on these sites would be viewed against a back drop of rising land and when viewed from across the valley would be seen in the context of the existing village and the A354 without affecting the rural character of the village. A sensitive design solution is achievable on these sites and taking them forward as allocations in the Neighbourhood Plan would assist in meeting the increased housing needs of the future.

In respect to the crossing of the A354 it is noted that the local concerns were not shared by the County Highway Authority who did not consider the impact to be severe. Nevertheless, there is scope to consider the provision of a pedestrian crossing over the A354 as off-site highway improvement works as part of any residential development proposal submitted in the future to address any significant highway impact.

For the above reasons we consider that the land to the south and east of Hyde Farm, Pimperne should be reconsidered as an allocation in the Neighbourhood Plan prior to its formal submission to the Local Planning Authority for examination.

Summary

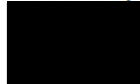
In summary we raise objection to the Neighbourhood Plan progressing as drafted and consider its submission should be delayed. We consider that the housing needs are no longer in accordance with increases expected in the near future, that the pro-rata distribution is an unsound basis for establishing the number of houses Pimperne should be planning for and that the preclusion of development to the east of the A354 is unnecessary.

Furthermore, we consider that land to the south and east of Hyde Farm, Pimperne should be reconsidered for allocation as the issues for its exclusion can be addressed through a sensitively designed proposal and through consideration of pedestrian crossing solutions. Further allocations in the Neighbourhood Plan would



assist with meeting the increasing housing needs in the district which translates to increased needs in Pimperne. We would welcome the opportunity to discuss the opportunities that land at Hyde Farm, Pimperne could offer to the Neighbourhood Plan as it progresses further through the process.

Yours sincerely



Steve Clark
Associate

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Steve Clark
Associate

