

North Dorset Local Plan Part 1 Examination

Statement submitted by Savills on behalf of Barratt David Wilson Homes

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

Hearing: Thursday 12 March 2015, 10.00

Respondent ref number: 3027

February 2015

Savills Planning
Wessex House
Priors Walk
Wimborne
Dorset
BH21 1PB



Introduction

This statement is submitted on behalf of Barratt David Wilson Homes in relation to land to the south east of Wincombe Business Park.

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

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)?

and

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)

1. 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.
2. 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.
3. As set out in our previous consultation responses, the proposed housing target should be expressed as a minimum, this would provide more flexibility to adapt to changing circumstances over the plan period.

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?

4. 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).
5. As expressed in our previous representations, we have suggested that housing provision based on the projected household change should be considered a minimum.

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

6. 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)?

7. 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).
8. 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.
9. 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.

10. Appendix 2 includes an allowance for 130 homes within the five year land supply from land adjoining Wincombe Business Park. This land is in the control of Barratt David Wilson Homes, a major nation-wide house builder, and a detailed planning application for 196 dwellings has been submitted (Ref No 2/2014/1350/FUL, and referred to as 'Land off Wincombe Lane'). As set out in our statement on Issue 9: Shaftesbury, this site is considered available, suitable and deliverable. The 5 year supply from this site as set out in the AMR is considered realistic and achievable.

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)

11. A housing trajectory would be welcomed.

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

12. 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?

13. In relation to the level of housing provision proposed at Shaftesbury, this should be considered a minimum. As set out in our statement on Issue 9, land to the south-east of Wincombe Business Park is available and deliverable.

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?

14. A flexible approach to housing mix is sought in order to reflect local circumstances and viability, as set out in previous representations.

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?

15. The concentration of provision at the market towns will help the provision of affordable housing where need is greatest.

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?

16. 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 4th 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)?

17. 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 ...’.*

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

18. As noted in our response representations, housing provision based on the projected household change should be considered a minimum.