

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

See supporting covering letter

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

See supporting covering letter

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

See supporting covering letter.

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.

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.

See supporting covering letter

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

Yes

No

Signature: Tim Gent

Date: 22/01/2018

If submitting the form electronically, no signature is required.

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

10 January 2018



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

Via email: planningpolicy@northdorset.gov.uk

Tim Gent

[Redacted signature block]

Dear Sir / Madam

NORTH DORSET LOCAL PLAN REVIEW – ISSUES AND OPTIONS CONSULTATION

Savills has been asked by Charles Bishop Limited (CBL) to review and comment on certain questions in the Issues and Options Consultation paper (the IOP) which forms part of the North Dorset Local Plan Review (NDLPR).

CBL is a developer with experience of delivering housing sites across Hampshire, Somerset and Dorset. The company is based in South Somerset where it has been responsible for the development of a number of key sites, the largest of which being the 900 unit Brimsmore scheme in north Yeovil, which is being developed in partnership with Wyatt Homes of Poole. CBL works in a variety of locations on schemes of different scales and types. This experience – which spans all stages of the development process from site identification and promotion to the delivery of new homes - means that the company is very well placed to comment on the IOP and the questions it raised. This letter sets out its response which focuses on the overall amount of housing that should be planned for and the places that this necessary growth should be directed to.

Question 1

This question asks which of two population projection scenarios should be used to calculate the Objectively Assessed Need (OAN) and therefore the amount of land that will need to be allocated as part of the NDLPR.

The first option is to use the figure of 330 units (per year) from the Strategic Housing Market Assessment (SHMA) prepared in 2015 which covers the whole of Dorset. This figure is made up of three parts; the first is the 2012-based Household and Population Projections which totals 206 units, the second adds 19 units to improve affordability for younger households and the third an additional 105 units (again per year) for economic growth led projections.

Over the 20 year Plan Period this would mean a total requirement of 6,600 units.

The second option is to use the standardised OAN methodology that is set out in the 'Fixing Our Broken Housing Market White Paper'¹. This was published in February 2017 and has the clear aim of tackling the chronic undersupply of new homes. The proposed methodology adopts a three stage approach which starts with the 10 year average level of household growth, adjusts it based on the balance of income and median house price, and then caps the level of adjustment to 40%. When such a methodology is used, the requirement for North Dorset is 366 units per annum meaning a total requirement over the 20 year Plan Period of 7,320 units.

¹ Available here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf



This approach is identified as the preferred option by North Dorset District Council (NDDC) in the IOP.

There are two points that CBL wishes to make on this issue.

The first is to support the Council's use of the OAN figure set out in the White Paper rather than the one that emerged through the SHMA.

Table 1 of the 'Planning for the Right Homes in the Right Places: Consultation Proposals'² (in essence the consultation version of the White Paper) sets out the proposed transitional arrangements from the present OAN calculation scenarios to the new methodology. The Proposals state that where a local plan was adopted in the last five years, the new standardised OAN method should be used when the plan is next reviewed. Given that the NDDC Local Plan Part 1 (LPP1) was adopted in January 2016 (with a strong recommendation for swift review, which is being implemented now), NDDC is right to use the White Paper OAN methodology for the purposes of the NDLP (and the pragmatic and forward thinking approach taken is welcomed).

The second point is to consider whether elements used in the SHMA OAN methodology should be added on to the requirement calculated through the White Paper OAN methodology. Given that the White Paper methodology makes allowances for affordability it is unreasonable to suggest that the younger household affordability top-up made in the SHMA should be added on top of the White Paper figure.

However, CBL sees two potential additions to the White Paper OAN that are informed by the findings of the SHMA:

1. One of the RTP's core criticisms³ of the White Paper OAN is that it fails to take account of projected employment changes and their impact on housing demand. The OAN methodology based on the SHMA makes provision for an additional 105 units per annum based on employment growth projections. Assuming these ambitions remain, a similar allowance should be added to the White Paper OAN figure to secure that economic boost (or not stand in its way).
2. The SHMA found that there was a requirement for 1,012, or 50 per annum, specialist housing units in North Dorset over the Plan period. It is not clear whether the White Paper OAN includes this provision, but if it does not, a further increase will be triggered. This was the approach adopted by South Somerset District Council (SSDC) which also made an allowance for concealed households.

If the amount of housing associated with the above two points were added to the White Paper methodology, this would lead to an annual requirement of 521 units per annum or 10,420 across the plan period. This is a major increase in scale and for a number of reasons is not one that CBL recommends. **What CBL would say though is that the White Paper OAN figure of 366 per annum (or 7,320 in total) should be seen as a minimum and that there could be scope or in fact the need for an increased figure depending on NDDC's aspirations.**

Questions 4, 5 and 21

Policy 2 of the NDLP1 sets out the spatial strategy for NDDC.

The strategy focusses all growth towards the four 'Main Towns' of Blandford, Gillingham, Shaftesbury and Sturminster Newton where any significant housing allocations will be made. It also identifies 18 Larger Villages as well as Stalbridge which, despite not containing allocations, should provide an amount of housing to meet local needs. The NDLP1 then allocates land for some 4,935 units across the four main towns and expects 825 units will come forward in Stalbridge and the Larger Villages.

² Available here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Right_Homes_Consultation_Document.pdf

³ Available here: <http://www.rtpi.org.uk/media/2584831/Right%20homes%20right%20places%20response.pdf>

In the context of the increased requirement (which is likely to add between 50 and 100 units to the annual requirement), Questions 4 and 5 ask whether that settlement strategy should be carried forward as part of the NDLP. R.

The IOP broadly concludes that it should. It adds Stalbridge to the list of Main Towns but continues to focus growth at these towns – with the large villages only expected to accommodate unallocated local needs. Following this decision, Questions 6 to 21 ask what amount of growth should be located at each of the main towns and which sites should be allocated. Question 21 asks whether the strategy for the Larger Villages should be retained and is of particular interest to CBL.

As a headline, CBL suggests that the Council’s starting point is wrong. The current settlement strategy is failing to deliver the required housing and simply continuing that strategy – with the addition of Stalbridge to the main town category – will neither correct the current failure or deliver the additional requirement that the Review will identify. Instead, CBL suggests that allocations are made within the ‘Larger Villages’ (or some of them) that reflect their size and sustainability. This new tier or component of the spatial strategy will provide an additional opportunity to accommodate necessary growth in a timely manner (and will sustain the facilities within the identified settlements)

In terms of the existing strategy and its ability to deliver the housing required there are two points to be made.

The first is that the number of units not yet provided for in the NDLP. R period cannot be delivered sustainably if a strategy is implemented that relies so heavily on the five main towns.

In the six years since the start date of the NDLP. R1 (2011), only 1,034 units have been completed across the four main towns meaning that there are 3,901 units currently allocated but not completed. In the first four years of the NDLP. R period there have been 767 completions. If all of the uncompleted allocations made in the NDLP. R1 were to be carried over into the NDLP. R, then even applying the White Paper OAN (as the IOP does), there would be a requirement to deliver a new or additional 2,652 units across NDLP. R on top of what has been provided so far and is allocated as part of the NDLP. R1.

The spatial strategy set in Policy 2 seeks to allocate land for 86% of the dwellings in the Main Towns and 14% in the Larger Villages. If this strategy were to be carried forward, this would mean that there would be a requirement to allocate land for 2,280 units on top of the existing allocations made within the existing NDLP. R1.

The following table shows the four Main Towns in Column 1, the allocations that are made as part of the NDLP. R1 in Column 3 and the number of additional units that would need to be allocated to accommodate the required growth if the existing strategy were to be proportionately maintained in Column 4. The combined total of new houses needed between the period between 2011 and 2033 is shown in Column 5 and the figure for percentage increase in the growth of each settlement is in Column 6 (based on the 2011 Census Population shown in Column 2).

Column 1 Settlement	Column 2 Number of Households	Column 3 NDLP. R1 Allocations	Column 4 NDLP. R IOP Allocations	Column 5 Combined Allocations (2011-2033)	Column 6 Percentage Increase on Existing Settlement Size
Blandford	4,560	1,200	382	1,582	65
Gillingham	5,107	2,200	710	2,910	43
Shaftesbury	3,235	1,140	364	1,504	54
Sturminster Newton	1,910	395	127	522	73

Table 1

There is probably little need for further significant explanation of the above table or its implications. A strategy which results in increases to the size of multiple settlements of between 40 and 70% is highly unlikely to be deliverable or desirable. Growth on this level – even if commercially realistic - is likely to be significantly constrained by infrastructure and by genuine concerns about the pace of change.

The second point (about a continuation of existing strategy) reinforces this analysis. It says that the number of homes needed over the remainder of the NDLP period cannot be realistically delivered if a Main Town only strategy is employed.

Between 2013 and 2017 (the period of the NDLP which has already taken place) there has been a total of 767 completions equating to a rate of 192 units per annum. Given that using the White Paper OAN methodology sets a total requirement for 7,320 units completions over the NDLP period, 6,553 completions are needed over the remaining 16 years of the NDLP period. This triggers an annual requirement of 410 units to be completed per annum (from now). Such a rate of delivery has not been achieved since 2005/2006, when the economic context was considerably more favourable, and was not sustained for longer than five years.

The following Table 2 shows the completions achieved since the adoption of the NDLP1 and the annual delivery rate for the NDLP1. It then shows how many units still need to be delivered in each of the four Towns as well as the Main Villages over the NDLP period, as well as the delivery rate that would be required:

Settlement	Units Delivered (2013-2017)	Annual Delivery Rate (Units/Year)	Combined Allocations (2013-2033)	Number of Units Left to be Delivered	Required Delivery Rate (Units/Year)
Blandford	171	43	1,582	1,411	88
Gillingham	28	7	2,910	2,882	180
Shaftesbury	362	91	1,504	1,142	72
Sturminster Newton	13	3	522	508	32
Main Town Total	574	144	6,518	5,944	372
Countryside (Including Stalbridge and the Larger Villages)	193	48	832	639	40

Figures do not add due to rounding

Table 2

The table shows that to succeed (or perform), delivery rates required for the Main Towns for the 16 years remaining in the (proposed) NDLP period would need to be more than double that for the first four years of the (current) NDLP1 Period. Even with a significant and immediate improvement, the plan realistically cannot deliver in time and neighbourhood plans experience says that neighbourhood plans will not step into any breach – such plans are not mandatory and do not have a track record of positive allocations where the development plan does not ask for them . Failure – and perhaps fundamental failure – is, unfortunately, much more likely.

An adjusted, new or different strategy is therefore required and this should include some growth in larger villages. This will supplement the development that the main towns can deliver – not replace it. Planned properly, this growth can capture the clear potential for development outside the main towns and the concerns previously associated with it. Paragraph 3.40 of the NDLP1 explains both positions when it says:

‘In the recent past, housing development in the rural areas significantly exceeded planned rates, yet did not always enable rural facilities to be retained or enhanced. The Council does not want to see this unsustainable spatial distribution of development repeated.’

There are two points to be made here.

The first is that NDDC recognises that delivery rates in the rural areas have historically been higher than anticipated. The Larger Villages are clearly attractive locations where people want to live and where development can be delivered. As stated above, the White Paper OAN figure for the NDLP is substantially higher than that used for the NDLP1 and this, combined with the shortfall caused by the slower than expected delivery rates in a number of the Main Towns, means there is a requirement for a strategy that is capable of accommodating the level of growth required. Diverting more growth to the Larger Villages through allocations therefore provides a real chance of delivering the amount of housing required.

The second is that the review provides an opportunity to carry out a systematic assessment of villages and sites that will deliver the best overall outcomes. Taking a positive approach at this stage will trigger a comprehensive assessment of which villages and which sites can make a sustainable contribution to growth requirements. This can be based on technical, practical, commercial, social and environmental tests or criteria and can respect or inform decisions by infrastructure providers and other stakeholders. The approach reflects the inherent benefits of positively identifying places and making housing allocations rather than responding to failure and the challenges that come with it.

It will also reflect that growth in many villages can be sustainable. At a settlement level (which appears most relevant to this IOP stage). The general selection process is reasonably well rehearsed and has in fact been carried out quite recently for North Dorset too. That analysis shows that one village –Marnhull – already has very good credentials as a location for growth.

One important source is the Spatial Strategy Topic Paper (SSTP) which was prepared in 2009 as part of the evidence base for the NDLP1⁴. The SSTP found that Marnhull was the fifth largest settlement in North Dorset with a population that is much closer to that of Stalbridge than the other villages. On this basis, the SSTP concluded that Marnhull, as well as Sturminster Newton (a main town) had an important role in providing facilities and servicing the surrounding villages and rural areas in the north-western part of North Dorset. This reflects the fact that Marnhull offers:

- Two primary schools;
- A village hall;
- A doctors surgery and pharmacy;
- A range of public houses, two convenience stores and a small number of other shops serving local needs
- Local employment opportunities, in agriculture most locally but with other sources nearby; and
- A number of bus stops served by routes to Yeovil, Gillingham, Blandford, Sherborne, Sturminster Newton, Stalbridge, and Wincanton.

The village is also largely unconstrained. Whilst the data accompanying the housing White Paper found that 39% of NDDC was either covered by a Green Belt, National Park, Area of Outstanding Natural Beauty or Site of Special Scientific Interest, Marnhull is free from these constraints and is not affected by any flooding, ecological or landscape designations. The village can also clearly deliver new homes and is a popular place to live. Marnhull should therefore be at the top of the list of places which will add to NDDC's overall portfolio of growth options (which need to be expanded if necessary housing is to be delivered). On any analysis it can deliver new homes and provides the conditions for accessible, self-contained, attractive and environmentally acceptable new development.

In this context, CBL concludes that the settlement strategy proposed in the IOP is unlikely to deliver the amount of housing required. A new and additional source is needed and this should come from appropriate allocations in some of the Larger Villages. Identifying key settlements and allocating housing here will take some strain away from the Main Towns and will result in more sustainable and reliable pattern of growth. The village of Marnhull should be at the top of any list of candidates.

⁴ Available here: https://www.dorset.gov.uk/media/147731/Topic-Paper-Spatial-Strategy/pdf/Topic_Paper_Spatial_Strategy_V2.pdf

xxx

These are the main points that CBL wishes to make on the Issues and Options Paper. In a nutshell and based on CBLs considerable evidence, experience and intelligence, two key recommendations are made:

- a) To support the use of the OAN methodology proposed in the White Paper but to advise that it should very much be seen as a minimum figure of a potentially larger range;
- b) To suggest that allocations are made within some of the Larger Villages, especially the village of Marnhull. Given the increased OAN from the White Paper, the Larger Villages will need to accommodate a level of growth and this can clearly be done confidently and sustainably at Marnhull.

These points are straightforward and clear, but CBL would be happy to explain them further either now or as progress is made with the Review.

With kind regards

Yours sincerely

Tim Gent
Director