

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 Hall & Woodhouse 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.

Hall & Woodhouse 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.

Hall & Woodhouse do not agree with the conclusions regarding the areas of search identified at Sturminster Newton. Hall & Woodhouse have three pubs in Sturminster Newton. The White Hart and Swan Inn are both located in the town centre whilst the Bull Inn is situated to the south of the town on the A357. Hall & Woodhouse have been actively and positively engaged with the Sturminster Newton Neighbourhood Plan Group and land adjacent to the Bull Inn is currently identified as a housing allocation in the emerging Neighbourhood Plan.

The recently submitted planning application for 19 dwellings on the site includes supporting information and reports that deal with ecology, landscape and heritage thereby demonstrating that these matters are not constraints to the development of the site. We consider that the areas of search at Sturminster Newton should be reconsidered to include area D and the land adjacent to the Bull Inn be considered for allocation in the Local Plan Review.

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

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, Hall & Woodhouse 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.

Hall and Woodhouse sites submitted as part of this representation to be considered for residential allocation in the larger villages include:

- Land adjacent to The Antelope, Hazelbury Bryan – Approximately 45 dwellings
- Field to the rear of the former Red Lion, Bourton – Approximately 15 dwellings
- Land adjacent to the Charlton Inn, Charlton Marshall – Approximately 35 dwellings
- Land to the rear of the Farqharson Arms, Pimperne – Approximately 4 dwellings

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, H&W 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

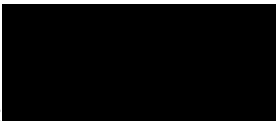
If you have any comments about the Issues and Options Document or the Sustainability Appraisal please set them out in the box below. If your comments are in relation to a specific question or chapter of the Issues and Options Document then please state which question or chapter your comments relate to.

Please see the accompanying report which sets out the Hall & Woodhouse 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 Hall &
Woodhouse Ltd.**



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1. Introduction

- 1.1 The following comments are submitted on behalf of Hall & Woodhouse (H&W) in respect of their land interests in 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 H&W has a strong and intrinsic link with North Dorset having had a brewery presence in the District since 1777 and a presence in Blandford for over 150 years. H&W has demonstrated its longer term commitments to its continued presence in North Dorset since 2013 through the investment of £20 million made on the site in Blandford in its new modern brewery complex as well as the refurbishment of the Crown Hotel. H&W also operate a business strategy that seeks to reinvest in its pubs and therefore where opportunities exist for development, revenue generated from the development is reinvested into its pubs thereby enhancing their longer term viability.
- 1.3 H&W are proud to have established positive relationships with North Dorset District Council (NDDC) over the years and fully intend to maintain those relations moving forward. We welcome the opportunity to comment on the LPR Issues and Options consultation and look forward to working closely with NDDC to assist in identifying sustainable opportunities to meet 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. H&W believe that its landholdings across the District provide potential opportunity for smaller housing allocations within sustainable villages contributing towards maintaining the viability of the villages and promoting a balanced and deliverable spatial strategy. These smaller allocations 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 H&W 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 H&W 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: $2254 + 20\% = 2705$ dwellings
- Annual housing requirement over the next 5 years: $2705 \div 5 = 541$ 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 H&W 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.

NDDC Local Plan Review Issues and Options Consultation

Representation



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)

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 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 Q15. Sturminster Newton

- 5.1 H&W do not agree with the conclusions regarding the areas of search identified at Sturminster Newton. H&W have three pubs in Sturminster Newton. The White Hart and Swan Inn are both located in the town centre whilst the Bull Inn is situated to the south of the town on the A357. H&W have been actively and positively engaged with the Sturminster Newton Neighbourhood Plan Group and land adjacent to the Bull Inn is currently identified as a housing allocation with an indicative capacity of 10 units (although the policy

is not specific) in the emerging Neighbourhood Plan. A planning application has been submitted and is awaiting registration for the erection of 19 dwellings on the site.

- 5.2 The development opportunities on land adjacent to the Bull Inn are being actively pursued as part of H&W's investment programme into its existing pub stock. The Bull Inn is in need of investment to make the business more attractive to a landlord due to existing limitations of the building's accommodation and its external areas. The development rationale for the land adjacent to the Bull Inn will deliver a range of benefits including:
- The provision of suitable tenant accommodation through the provision of a separate managers dwelling;
 - additional dedicated parking;
 - flood alleviation measures;
 - improved visibility of the public house in a landscaped setting, and
 - the potential to make improvements to the trading space to increase the number of covers.
- 5.3 As well as supporting the longer term viability of the Bull Inn, H&W would also look to reinvest in the Swan Inn in the town centre. H&W is committed to supporting the longer term retention of these existing town facilities and will seek to reinvest revenue generated from the development of land adjacent to the Bull Inn into these pubs.
- 5.4 H&W do not agree with Q15 and the conclusions regarding the areas of search identified at Sturminster Newton which seeks to exclude area D within which the land adjacent to the Bull Inn is located. In support of the submitted application is an ecological appraisal and biodiversity mitigation plan, landscape appraisal and heritage report which address the key issues for exclusion of this area within the wider search. It is also relevant that the site has support at the local level through its allocation in the emerging Neighbourhood Plan and can make a meaningful contribution towards the housing requirements and supply of housing in the District.
- 5.5 The site is connected to the centre of Sturminster Newton by footpaths and located in close proximity to the junction of the A357 that links to the bridge over the River Stour into Sturminster Newton. This provide opportunity for pedestrians to cross the A357 safely and is therefore not a barrier for sustainable connectivity into the town. In view of this representation we consider that the areas of search at Sturminster Newton should be reconsidered to include area D and the land adjacent to the Bull Inn be considered for allocation in the LPR.

6. Representation to Q21. The Villages

- 6.1 In response to Q21, H&W 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.

- 6.2 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.
- 6.3 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.
- 6.4 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

- 6.5 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.
- 6.6 H&W own in the region of 20 pubs across the District and a number of these are located within the settlement boundaries of the larger villages with additional land situated adjacent to the existing defined settlement boundaries. Those pubs with land that is sustainably located within the larger villages or adjacent to existing defined boundaries are considered to represent significant opportunity for allocation and 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.
- 6.7 H&W's sites that are submitted as part of this representation to be considered for allocations in the villages include:
- Land adjacent to The Antelope, Hazelbury Bryan – Approximately 45 dwellings
 - Field to the rear of the former Red Lion, Bourton – Approximately 15 dwellings
 - Land adjacent to Charlton Inn, Charlton Marshall – Approximately 35 dwellings
 - Land to the rear of Farqharson Arms, Pimperne – Approximately 4 dwellings
- 6.8 H&W has already considered the development potential of these sites and produced 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. Land in Hazelbury Bryan, Bourton and Charlton Marshall is all located on the edge of the existing settlement boundary and will be viewed in the context of existing built form.
- 6.9 Land adjacent to The Antelope is situated in the hamlet of Pidney and would be located between ribbon development to the west and east of the site with The Antelope located to the south. There are no landscape designations here and given the context of the site adjacent to existing development the landscape impact would be minimal and localised. The scheme has been developed to sensitively respond to the setting of the listed Antelope pub and there are no other heritage constraints. The site in Hazelbury Bryan could therefore be delivered without any significant harmful effects and would deliver a strong positive impact in meeting the District's strategic housing requirements.
- 6.10 Land to the rear of the former Red Lion in Bourton is also located on the edge of the settlement boundary. Development of this land would see an extension to the previous development at Old Pound Court. The site is located to the rear of the ribbon development that follows the main road through Bourton and would be consistent with the character and development of Bourton which has seen small developments extend off the ribbon development along the road frontage. Views of the site would be limited with strong tree coverage to the north, existing development to the south and east. Landscape impact would be minimal and localised in views from the west. There is no conservation area in Bourton but several listed buildings are located in the vicinity of the site. A sensitively designed solution is considered possible that will prevent

any impact on the setting of these listed buildings. The site in Bourton could therefore be delivered without any significant harmful effects and would deliver a strong positive impact in meeting the District's strategic housing requirements.

- 6.11 Land adjacent to the Charlton Inn would follow the pattern of development in the village along the A350. It is located on the edge of the defined settlement boundary and would be viewed in the context of the existing built form in the village when travelling along the A350 and when looking towards Charlton Marshall from the north and east. As a result the impact on landscape would be localised to the extent of the loss of views out towards the countryside from the A350 in this part of the village. The site is located beyond the designated conservation area and sufficient distance from the listed buildings not to present a risk to their setting. The site in Charlton Marshall could therefore be delivered without any significant harmful effects and would deliver a strong positive impact in meeting the District's strategic housing requirements.
- 6.12 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.
- 6.13 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.
- 6.14 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.

7. Representation to Q22. and Q24. Affordable Housing

- 7.1 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, H&W 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.

- 7.2 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.
- 7.3 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.
- 7.4 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.

8. Conclusion and Summary

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 H&W believe that it 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

Steve Clark
Associate

