

Matter 3
ID: 578
Betterment Properties (Weymouth) Ltd

West Dorset, Weymouth and Portland Local Plan
Examination in Public Statement

MATTER 3

Statement
On Behalf Of

Betterment Properties (Weymouth) Limited

**WEST DORSET, WEYMOUTH AND PORTLAND LOCAL PLAN EXAMINATION IN
PUBLIC
MATTER 3**

PREAMBLE

QUESTIONS 3.2 – 3.5 have, in large measure, been answered by Antony Pollard of Turley Limited. I merely wish to add some comments from the perspective of a Local Consultant. I have two preliminary points based on local knowledge:

FULL OBJECTIVE ASSESSMENT OF HOUSING NEED

1. I have been an active Planning Consultant in the area since 1979 and can confirm from my participation in examinations of Structure Plans and the former Regional Plan, which the authorities within Dorset have collaborated to constrain development in the county to deter migration, with a view to protecting environmental assets. It is obvious that the amount of housing has been artificially constrained below full objectively assessed needs since 1980. That is evident from the records of completions clearly illustrated in the Bournemouth, Dorset and Poole Structure Plan adopted in February 2001. Figure 6.3 of that Plan also shows the 1992 ONS based projections being significantly more than Structure Plan assumptions.

EMPLOYMENT LAND SUPPLY

2. My local knowledge includes matters related to the lack of availability of employment land in Dorset. Sites shown to be available for employment were grossly exaggerated by West Dorset. I am also aware that sites previously set aside for employment floor space have now been developed with retail and that an employment site at Bridport is shown in the land availability for residential purposes.

Q 3.2

3. The Plan does not positively address the balance between new employment and housing development. The SHMA update has sought to consider the two authorities collectively with regards to the balancing of housing need and employment growth. Whilst there are individual outputs for each authority the conclusions are based solely on modelling outputs related to demographic and economic projections of the future. The Draft Plan does not

appear to have critically appraised the outcomes of the modelling in relation to the spatial strategy or its implications for the distribution of either housing or employment.

4. The supporting evidence suggests that the 775 dpa plan figure is estimated to support a growth in economically active persons of 2,300 between 2011 and 2031. This level of 'labour-force' falls below a number of submitted economic forecasts. This includes:
 - Cambridge Econometrics – 12,400 jobs projected to be created between 2011 and 2031¹
 - Oxford Economics (September 2014) – 8,300 jobs between 2011 and 2031²
 - Experian (June 2014) – 4,300 jobs between 2011 and 2031³
5. The Council's evidence base has not sought to assess or evaluate the 'likely level of job growth' as required through the PPG. This represents a significant failing and undermines the weight which can be placed upon the outputs of the SHMA evidence. In order to present an integrated evidence base, recognising the scale of departure in the planned level of job growth in the latest iteration of the Local Plan, work should have been undertaken to update the employment land evidence in order to examine in more detail the level of future job growth. This in turn should have informed the objective assessment of need.
6. It is apparent from a review of other important indicators of future job growth that there is strong evidence of a more positive economic outlook. We have set out a detailed review of these aspects within our previous representations:
 - Evidenced strong historic levels of job growth. Approximately 10,000 jobs created between 1997 and 2012 (approximately 665 jobs per annum);
 - A clear economic vision for the area in the previous iteration of the Draft Plan. This was reflected in the allocation of additional employment land allocations. It is estimated that in excess of 7,000 gross jobs could be supported through B use land with planning permission already in place⁴. These are split comparatively evenly between the two authorities.

¹ Cited within ID:933 Representations –

² Cited within ID 648 Representations

³ Within our appended evidence to representations on the FPC.

⁴ See Figures 4.5 and 4.6 of the Turley Appendix submitted alongside consultation response to Further Proposed Changes, September 2014

- It is asserted by the LEP that the proposed investments within the SEP have the potential to create 22,000 new direct jobs in the region as well as almost 80,000 indirect jobs. Portland Port is cited as having the potential to generate an additional 2,666 FTE jobs.
7. It is understood that the modelling within the SHMA Update, in assessing the alignment between housing needs and jobs, assumes a profile of migration (by age) which reflects the pre-recession period. It is important to set this in the context of the economic climate of this period and the 'economic ambition' in the Draft Plan. Over the period 2001 to 2007 the two authorities are estimated to have created in the region of 7,000 jobs. By contrast, as outlined above, the Local Plan is now planning to support only the provision of 2,300 jobs.
 8. It is not apparent how such a limited growth in jobs will be translated into a profile of in and out migration which reflects the pre-recession period. In this context it is also important to recognise the changing scale of affordability issues over this period. Evidently based on the analysis presented in Part 2 of the SHMA younger households face considerable challenges in accessing housing in the area as a result of worsening affordability issues.
 9. On the basis of the above it is clearly evident that the housing requirement for the two authorities and its distribution as established in the Plan does not respond positively to the available evidence relating to employment growth prospects or indeed market signals and is therefore not considered appropriate.

Q 3.3

10. Our response to question 3.2 highlights that the planned level of housing identified within the SHMA Part 1 is assessed as only being able to support a modest level of labour-force growth. Any level of job growth above this labour-capacity will be required to be met through commuting from surrounding areas. This suggests a significant risk that rather than reducing commuting pressures into the Local Plan area they will continue to worsen.
11. This is a trend which has already been occurring over recent years. It is apparent when comparing the number of working residents within the area with the workforce that between the two Census years West Dorset has become increasingly reliant on importing labour and Weymouth & Portland has increased the number of people travelling to other areas to work⁵. It is not apparent how the Draft Plan proposes to address this imbalance.

⁵ Figure 6.5 of Turley Appendix submitted alongside consultation response to Further Proposed Changes, September 2014

Q 3.4

12. There is not considered to be sufficient flexibility in the Plan to respond to changing circumstances.
13. Evidently the area has a strong history of creating jobs, the Local Plan, appears to suggest a significant departure, at least in the level of housing it proposes, from seeking to enable a comparable level of job growth in the future.
14. If stronger job growth is realised, a prospect which based on the available forecasts certainly represents a reasonable assumption, this will have a significant impact on further worsening commuting patterns without an adequate response through the provision of sufficient amounts of housing.
15. It is apparent that there is identified unmet housing need in authorities which share housing market linkages. This is reflected in the Inspector's Report / Correspondence in relation to both the Purbeck and East Devon Local Plans.
16. The Draft Plan does not provide any flexibility to address these identified unmet needs. In this context it is important to consider the comparative environmental constraints in surrounding areas and in West Dorset and Weymouth & Portland. There is a duty of care on these authorities, which are relatively unconstrained, to take an active role in meeting housing needs from elsewhere.

Q 3.5

17. The Plan's proposed requirement of 775 dpa does not represent the full OAN. The distribution derived from the evidence does not fully reflect evidence of need.
18. Our previous modelling of an OAN for Weymouth and Portland (Appendix AP1) identified a need to provide at least 300 dpa to support a limited uplift in employment. This also reflected the evidenced pressing need relating to affordability challenges within the authority. The subsequent analysis within our representations to the Further Proposed Changes reinforces that significant need pressures remain across the two authorities and on this basis even taking the PBA assessed need in West Dorset for 605 dpa (as a baseline) would result in a need for in excess of 900 dpa across the two authorities. It is noted that this level of need more closely relates to the Draft RSS Requirement, which in itself is identified as representing a 'constrained' figure.

19. A review of historic rates of development⁶ reveals that the two authorities have delivered almost 720 dpa between 2001 and 2011 and almost 800 dpa over the more buoyant economic period of 2001 and 2007. Prior to 2006/07 the authorities collectively delivered levels of development which peaked at over 900 dwellings in 2005/06. The proposed plan target fails to respond positively to the NPPF's requirement to 'boost significantly' the supply of housing. When looking at the two authorities individually Weymouth & Portland contributed on average almost 270 dpa between 2001 and 2011 (285 dpa between 2001 and 2007) with the PBA assessed need of 160 dpa notably lower than historic levels of development.
20. Recognising that the PBA Assessment primarily bases its assessment of future need on historic demographic trends it is important consider these in the context of historic planning policy. Malcolm Brown has undertaken a detailed review of the establishment of historic policy targets across the two authorities (Appendix MDB1). This consistently reveals that policy targets have represented a constraint based approach to meeting housing needs. This will have impacted upon the extent to which the population has been able to grow and households form. The approach taken to project forward based on historic demographic trends therefore fails to recognise the full impact of these historical policy constraints and on this basis is likely to perpetuate a constraint based assessment of need.
21. The evidence within the SHMA does not adequately explain how market signals, and in particular the need for affordable housing, has been taken into account in deriving the OAN. It is apparent from a review of the market signals that there is evidence of worsening trends indicating that supply has failed to keep pace with demand. This has manifested itself in a sustained affordability challenge within the two authorities.
22. The SHMA Part 2 report identifies a total need for 785 affordable houses per annum across the Plan area (362 in West Dorset and 423 in Weymouth & Portland). We have concerns around the methodological approach applied subsequent to this calculation of affordable needs which reduces this need to 234 dwellings per annum and its compliance with the PPG as set out in our previous representations:
- Assuming that higher proportions of income are spent on housing costs will contribute further to driving households into housing need and/or have implications for their quality of life. This should not form the premise for positive planning and is not supported by the NPPF

⁶ Figure 3.2 of Turley Appendix submitted alongside consultation response to Further Proposed Changes, September 2014

and will evidently only serve to further exacerbate the acknowledged national 'housing crisis'⁷.

- Whilst it is acknowledged that the Private Rented Sector (PRS) has played an important role in meeting the needs of those households whose needs are not being met in other tenures over recent years it is not necessarily sustainable to assume this will continue in the future. Indeed it is noted that in 2013/14 median rents in both authorities for 2 bedroom properties were higher than the national average⁸. Neither the Appendix 2 of the NPPF nor the PPG recognise this sector as affordable housing.

23. It is apparent from the conclusion reached within the SHMA (Part 2) 2014 that the assessed need within each of the authorities does not reflect the OAN spilt within the Part 1 report. For example a minimum need of 130 new affordable homes per annum is identified within Weymouth & Portland, with currently over 3,200 households on the Weymouth and Portland Housing Register. The calculated affordable housing need per annum is approximately 76% of the 170 dwellings stated as representing total need in the authority (Paragraph 3.2.9 Local Plan). This strongly suggests that the need for affordable housing will not be met on the basis of the area from which they originate, the result being the displacement of residents outside of local market geographies.

24. It is apparent that the historic level of provision, across the two authorities, has proven inadequate to address affordable housing needs. Whilst it is recognised that meeting affordable needs in full will be challenging it is apparent that a failure to respond positively by setting a requirement which only marginally exceeds that consistently delivered in more positive economic times will only exacerbate the problem.

25. The housing requirement in the Plan does not provide for the full OAN and fails to adequately reflect needs within the two authority areas. There is compelling evidence that higher levels of job growth are likely within the area than can be supported through the scale of labour-force growth identified within the SHMA Part 1 report associated with the provision of 775 dwellings per annum. The Council's updated evidence base fails to adequately justify or evidence likely future job growth with this undermining the weight which can be placed upon the derived policies in the Plan. It is equally apparent that the Plan does not take a sufficiently positive

⁷ The Lyons Housing Review 'Mobilising across the nation to build the homes our children need', 2014

⁸ Figure 5.1 of Turley Appendix submitted alongside consultation response to Further Proposed Changes, September 2014

approach to address evidenced affordability issues which will continue to challenge the ability of the authorities to retain younger working age households.

Q3.6

“Is the phasing regime and housing trajectory realistic, ...and capable of providing an adequate supply of housing land?”

NO

26. The Joint Local Plan does not include any phasing regime. The trajectory is a reflection of the Local Planning Authorities consideration as to when development may take place. Allocation of land housing is likely to result in some sites envisaged for later in the Plan period might well come forward earlier. The latest proposed amendment to the Local Plan acknowledges that proposals in the Plan may not provide sufficient housing to meet the requirements for the whole of the Plan period. Planning authorities are relying on early review of the Plan for this purpose.
27. So far as the trajectory is concerned, I do not consider that this is realistic in the early years. Some sites will not deliver housing at the rate proposed and therefore that the trajectory is not itself appropriate.
28. With regard to assumptions about supply, I consider that as far as non allocated sites or sites without planning permission are concerned, these are severely overly optimistic (Appendix MDB2).

Q 3.7

No.

29. Even by the Local Planning Authorities own calculations there is barely a five year land supply. However, looking at individual sites which are comprised in the calculation, there is uncertainty over how many of these sites will deliver housing within 5 years.

PLANNING PERMISSIONS

30. The lpas have allowed for the phasing of some sites with planning permission. I note that the lpas have taken account of the past delivery rate at Poundbury, but There seems to have been no attempt to analyse whether other sites are capable of delivery within five years. I accept that Footnote 11 to the NPPF states that *“Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that the schemes will not be implemented within five years”*. I therefore accept the lpas’ figure of 2,752 dwellings.

ALLOCATED SITES

31. The total in the submitted Plan is 3,757 dwellings. However, I cannot accept that as many as 1,287 would be deliverable within five years. Footnote 11 in the NPPF referred to above also states: *To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable*. I have strong reservations with regard to many of these sites. My assessment of these sites is set out in MDB3 appended.
32. Amore reasonable figure for dwellings on allocated sites, deliverable within five years is in the order of 550-600 dwellings.

LARGE IDENTIFIED SITES IN SHLAA

33. These sites are neither allocated nor have planning permission at April 2014.. Since they do not by and large have planning permission, they are not available now. Furthermore, many of the sites are subject to alternative uses.
34. The threshold used is sites of more than 0.15 hectare, regardless of how many dwelling would be produced. This results in a great number of sites of less than 10 dwellings being

included. I have not examined any of those smaller sites, which should in my opinion be excluded from this category. Only sites where the authorities have identified the potential development within five years have been assessed. My findings are set out in appendix MDB3.

35. This is not a comprehensive appraisal of every individual site. However my conclusion is that most of the sites are not deliverable within five years. A small allowance of say 10% of the total number might be included.

MINOR IDENTIFIED SITES

36. I have not examined individual sites. The Ipas have determined that the annual provision of unidentified sites is in the region of 81 dwellings per annum, discounted by 50%. I would not demur from that assessment.

RURAL EXCEPTION SITES

37. These exception sites are purely speculative they should not be considered as available within five years. The conversion of rural buildings is that this is a diminishing resource and both these figures should be excluded.

SUMMARY

38. For all of the above reasons, I am of the opinion that the five year land supply from existing sources is in the order of 3,850 dwellings. Based on the Plan Requirement of 5471 dwellings over 5 years, this represents a shortfall of approximately 1,620 dwellings or 3.5 years land supply.
39. If Turley's assessment of the requirement is accepted then the years land supply is significantly less.