

Response by Brian D. Curry – ID Number 87 – Dated 30th October 2014

To

MATTER 3 Spatial Strategy Group 2

Section 3; SUS 1 – 5 WDWP Statement No: WDWP XXX AGENDA

At the meeting on Wednesday 26th October 2014

1.0 I have a level plot of 4 – acres in Longburton alongside the A352, within the 30 MPH speed zone with no environmental constraints and an existing pavement to the centre of Longburton 2 ½ miles from Sherborne with its many facilities and mail line railway station. Longburton itself has 10 facilities including two Churches, one Village Hall, one Church Hall, one Pub and one Infant and Junior School although not a state School it is a School. In realisation of the need for housing in West Dorset I submitted a Preliminary Application for a mixed development for construction within three years. I was informed that under the ‘Presumption in Favour’ phase the policies would permit a planning application to receive consideration despite the fact my land was not situated within a Defined Development Boundary (DDB). The Preliminary Application was submitted and a reasonably positive answer was received from WDDC. I was however also later informed in writing by a WDDC Planner that should the Local Plan be approved before my planning application was approved under the ‘Presumption in Favour’ phase then it would be turned down since the policies within the Local Plan inhibit any mixed developments outside of a DDB or where a DDB is absent. This very statement means I am unable to submit a planning application for much needed mixed housing despite WDDC agreeing that there is a village need for 10 - Affordable dwellings of various sizes from one bedroom to four bedrooms.

(3.6 Policy is NOT CAPABLE of providing an adequate supply of land)

2.0 It is because of the above that the following comments are stated for consideration by the **INSPECTORATE** during his appraisal of acceptability of the presented Local Plan.

3.0 Having attended all the consultation sessions held in September/October 2011, it was most noticeable that the vast number of attendees stated that in order to have built the required number of Affordable Dwellings for the next five years, then housing developments must proceed on the basis of mixed developments where the building of Market Dwellings could create for Landowners and Builders the funds to afford the building of Affordable Dwellings. WDDC continue to fail to appreciate this and continue to believe that Landowners and Builders will eventually be forced to accept that in locations outside of a DDB or where no DDB exists then developments of 100% Affordable Housing will ONLY be permitted. This is a continuation of previous policy which has demonstrably failed to have built the required number of Affordable housing.

4.0 WDDC own figures stated that an average of only 71 Affordable Dwellings were built each year during the period 2006/07 to 2010/11 and because of this WDDC stated in 2011 during the 2011 Consultation Meetings that they needed to increase the number to 900 subsequently reduced to 750 Affordable Dwellings EACH YEAR during the next five years. As the years 2011/12, 2012/13 are past and 2013/14 is almost past the question to the **INSPECTORATE** is how many of the 750 Affordable dwellings per year have actually been built during these years. Most likely very few and this therefore highlights the inadequacy of the current situation.

(3.5 Response -The latest housing assessment is not robust).

5.0 The maximum ratio of Affordable Dwellings to Market Dwellings was thought, by those attending the 2011 Consultation Meetings, to be 35% to 65%. Any greater Affordable percentage would decrease the potential for persuading Landowners and Builders to agree to Affordable Dwellings being built.

(3.1 Response – WDDC need to rethink their Local Plan policies).

6.0 WDDC unfortunately seem convinced that they do not need to permit mixed developments outside of DDB's or where no DDB exists to help secure 750 Affordable Dwellings per year. Very few Affordable Dwellings have been built since WDDC stated in 2011 at the Consultation Meetings that they needed 750 Affordable dwellings PER YEAR so WDDC are already failing to produce enough housing.

(3.1 Response -WDDC need to rethink their Local Plan policies).

7.0 Upon asking whether a planning application submitted during the 'Presumption in Favour' phase would be considered under the 'Presumption in Favour' policies, a WDDC Planner stated to me in writing that under the 'Presumption in Favour' phase developments outside DDB's or where a DDB is absent would be considered only during the operational phase of the 'Presumption in Favour' whereupon it would revert to the approved Local Plan policies which DO NOT PERMIT any Market or Mixed developments outside DDB's or where a DDB is absent.

(3.4 Flexibility absent).

8.0 The National Planning Practice Guidance (NPPG) document states within: "*blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence*". How then does a policy of stating that sites in Settlements such as Longburton, outside a DDB or in the absence of a DDB, can only be permitted to have 100% Ghetto style Affordable Housing. Is the policy of only permitting 100% Affordable Housing where the sites are outside a DDB or where a DDB is absent a blanket policy supported by robust evidence in accordance with the NPPG.

3.4 Flexibility absent, policy inhibits development).

9.0 Attention is drawn to the original APPENDIX E – Other Identified Sites produced by WDDC under the rejected Local Plan wherein is shown quite a number of sites having approximately 4,000 potential dwellings on agricultural land stated to be 'Outside Development Boundary'. What happens to these sites assuming the WDDC Planner's statement is correct in stating that mixed developments outside DDB's will not be approved under the Local Plan once approved. Under Appendix E the SHLAA2007 Report – Submitted Included Sites and Other Included Sites, the following reference numbers as an example of land outside a DDB:-

1/042/0060; 1/138/0016; 1/010/0007; 1/042/0110; 1/010/0005

10.0 The above are examples of sites 'Outside Development Boundary' and are part of 4,000 potential dwellings. Many such sites also have environmental and location restraints. What happens to all these properties if the WDDC Planner's above statement is correct.

(3.5 is the Local plan robust?).

11.0 Nationally there are many examples where Builders are avoiding providing Affordable Housing and there are scant Landowners who are prepared to release land for 100% Affordable Housing. Apart from the GHETTO aspect WDC still believe that there will be sufficient land available to build to their 2011 target of 750 Affordable Dwellings PER YEAR. I assume this target has not been further reduced.

12.0 How many Affordable Dwellings have been built in the last five years? Does the quantity built provide the required confidence needed to show that the Local Plan can be considered robust enough for approval?

13.0 WDDC will not succeed in having built 750 Affordable dwellings PER YEAR for the next five years. At a ratio of 35% Affordable to 65% Market then this would require 2,272 market dwellings plus 750 Affordable dwellings totalling 3,012 dwellings per year for the next five years. WDDC will substantially fail to build the required number of West Dorset Dwellings.

(3.6 Response –The WDDC Local Plan will as its track record likely fail to provide sufficient housing by also not addressing shortfall and the Report by the University of Cambridge Centre for Housing and Planning).

14.0 An RTPI commissioned study carried out by the University of Cambridge Centre for Housing and Planning Research produced a Report stating the following: -

“there are two reasons why the housing trends that have been projected forward in the official predictions may not continue unchanged. Firstly, increased international migration in the first decade of this century may have been responsible for a significant proportion of the changes to previous trends in household formation patterns. Secondly, it seems likely that the 2011 census results were influenced by both the economic downturn and the effects of a long period of poor housing affordability. This raises the question of whether Planners should assume that household size will remain stable or resume the previous falling trend. For some Authorities, this would affect the number of homes required by 30% or more”.

15.0 THE NPPG STATES THAT; *‘Local planning authorities should aim to deal with an under-supply within the first five years of the plan period where possible’. ‘To accept a longer period to address the shortfall is counter to the aim of significantly boosting housing supply and would run the risk of leaving households in need for longer’*

15.1 On the basis of the above evidence it is likely that WDDC will need to set a housing target for its district over and above that which is suggested by the 2011 census.

16.0 BEARING IN MIND THE SUBSTANTIAL UNDER-SUPPLY OF HOUSING WDDC NEEDS TO BE QUESTIONED WHETHER AND BY HOW MANY THEIR FIVE YEAR MARKET AND AFFORDABLE HOUSING TARGETS RECOVER THE SHORTFALL OVER THE LAST TWO YEARS TOGETHER WITH THE ADJUSTMENT ADVICE CONTAINED WITHIN THE AUTHORATIVE REPORT PRODUCED BY THE UNIVERSITY OF CAMBRIDGE CENTRE FOR HOUSING AND PLANNING RESEARCH. THE FIGURE PRODUCED SHOULD BE SUBSTANTIALLY IN EXCESS OF THE ORIGINAL QUANTITY OF 750 AFFORDABLE DWELLINGS.

(3.5 The Local Plan is not sufficiently robust)

17.0 MORE LAND IS REQUIRED COUPLED WITH A PROACTIVE WDDC WILLINGNESS TO PERMIT MIXED DEVELOPMENTS IN BOTH TOWNS AND **ALL** VILLAGES UNLESS THERE ARE VERY SOUND ENVIRONMENTAL REASONS TO OBJECT.

The WDDC available housing land bank is not adequate.

18.0 IT MUST SURELY BE SEEN THAT THE CURRENTLY PRESENTED LOCAL PLAN IS NOT CAPABLE OF ACHIEVING THE REQUIRED OBJECTIVE OF MEETING BOTH MARKET AND AFFORDABLE HOUSING NEED IN THE WEST DORSET DISTRICT UNLESS THERE IS MORE LAND, THE ‘PRESUMPTION IN FAVOUR’ CONTINUES AND THE REMOVAL OF ANY BLANKET HOUSING POLICY RELATING TO DDB’S WITHIN THE LOCAL PLAN.

19.0 IS THERE ANY EVIDENCE THAT SHOWS WDDC HAS MANAGED OVER THE LAST 24 MONTHS TO HAVE BUILT A QUANTITY OF AFFORDABLE DWELLINGS TO PLAN INCLUDING A REDUCTION IN THE SUBSTANTIAL AREAS.

20.0 THE PLAN AS PRESENTED DOES NOT ADDRESS THE SUBSTANTIAL SHORTFALL AND WILL NOT ACHIEVE THE DESIRED OBJECTIVE OF PROVIDING SUFFICIENT DWELLINGS OVER THE NEXT FIVE YEARS. PAST FAILURE WILL CONTINUE UNCHECKED IF THE LOCAL PLAN AS PRESENTED AND ALREADY SUBSTANTIALLY MODIFIED IS APPROVED. *****