

West Dorset and Weymouth & Portland Local Plan Examination

**STATEMENT FOR MATTER 3
GROUP 1**

SPATIAL STRATEGY: SECTION 3; SUS 1-5

25th NOVEMBER 2014

**FOR WOODSFORD FARMS
(REPRESENTOR REF: ID933)**

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3.1 Are there alternative development options, which would deliver a more effective and sustainable development strategy?

- 3.1.1 As outlined within our Statement on Question 3.5, the level of planned housing growth remains fundamentally too low to support identified economic and regeneration potential and make an appropriately positive contribution towards meeting affordable housing needs. The housing requirement also fails to address under-supply from the previous Local Plans (“LPs”). The LP development strategy therefore contained within the LP fails to be effective, positively prepared and consistent with national policy.
- 3.1.2 Given there are no absolute environmental, infrastructure, deliverability or land supply constraints that would limit the Councils’ ability to address under-supply, meet its economic and regeneration potential in full, and also make a significant contribution towards addressing affordable housing need, there is demonstrably a more effective and sustainable LP development strategy.
- 3.1.3 The LP development strategy should proactively plan to meet identified economic growth and regeneration potential in full, and look to make a significant contribution towards addressing and meeting affordable housing need.
- 3.1.4 To address this, the Council must withdraw and review the LP housing requirement and development strategy to allocate additional suitable housing land, such as the Woodsford Farms sites at Crossways.
- 3.1.5 Specifically in relation to Crossways, as explained within our Statement on Matter 13 and within our representations, the development strategy set out within the Pre-Submission LP Policy CRS1 represented the most effective and sustainable development strategy for Crossways.

3.2 Is the overall distribution of housing and employment appropriate to the needs of the two areas?

- 3.2.1 No.
- 3.2.2 Please refer to our Statements on Questions 3.3 a 3.4 and our Statement on Matter 13.

3.3 What effect will the balance of homes and jobs be likely to have in reducing commuting pressures?

- 3.3.1 To address the imbalance between jobs and housing and to help address affordability the South West Regional Spatial Strategy Examination Panel recommended increasing the housing requirement within the Housing Market Area (“HMA”) to 905 dwellings per annum (“dpa”).
- 3.3.2 The LP states (paragraph 3.2.7) that due to the aging population in-migration of economically active people will be necessary to support economic growth. However, as explained within our Statement on Question 3.5 and with our representations, the latest assessment of housing is fundamentally too low to support identified economic and regeneration potential.
- 3.3.3 But by not providing sufficient housing to support appropriate levels of working-age in-migration the LP risks potentially increasing in-commuting and travel to work distances and/or inhibiting economic growth and regeneration.
- 3.3.4 The LP is therefore unsound as it has not been positively prepared, nor is it effective or consistent with national policy.
- 3.3.5 As explained within our Statement to Matter 13 and within our representations, specifically in relation to Crossways, the reduced level of planned housing growth at Crossways will potentially create a significant imbalance in working age population and local jobs.
- 3.3.6 The LP growth strategy for Crossways will result in significant in-commuting and longer travel to work distances. To address this imbalance, the suitable Woodsford Farms sites at Crossways should be allocated for residential-led development. The LP Policy CRS1 should revert back to the Pre-Submission Policy CRS1.

3.4 Is there sufficient flexibility in the Plan to respond to changing circumstances?

- 3.4.1 The National Planning Policy Framework (“NPPF”) states (paragraph 157) that LP’s should be drawn up over an appropriate timescale, preferably a 15-year time horizon, take account of longer-term requirements, and be kept up-to-date.
- 3.4.2 As concluded by the East Devon LP Inspector the 15-year period provides developers, landowners and the council with greater confidence in long-term delivery and reduces the risk of being unable to react in time to changing circumstances (Appendix 2 of our representations).

- 3.4.3 Despite the Councils' evidence base covering the period to 2031 the LP only covers the period up to 2028. From adoption the LP at best has only a 13-year time horizon.
- 3.4.4 As concluded by the East Devon Inspector where the council's evidence base covered the longer term, in this case the period up to to 2031, it would be reasonable to expect the LP to also cover this period.
- 3.4.5 The Councils' decision to reduce the LP period where there is identifiable housing need and suitable deliverable and developable land, such as the Woodsford Farms sites at Crossways, is therefore irrational and unsound. The LP has not been positively prepared, nor justified or consistent with national policy.
- 3.4.6 Furthermore, as outlined within our Statement to Question 3.5, the LP housing requirement is significantly too low to support the Councils' latest economic evidence or other committed economic and regeneration projection within the area. This further demonstrates the LP's lack flexibility and responsiveness to changing circumstances. The LP is unsound as it has not been positively prepared, nor is it effective or consistent with national policy.

3.5 Is the latest assessment of housing robust and representative of needs in the two authority areas?

- 3.5.1 No.
- 3.5.2 As explained within our representations and within our Statement on Matter 1, the latest assessment of housing is fundamentally unsound as it fails to identify the full objectively assessed need ("OAN") for market and affordable housing within the housing market area ("HMA") and the extent to which unmet needs from neighbouring authorities could be met within the HMA. This failure alone renders the LP unsound against national policy.
- 3.5.3 The National Planning Practice Guidance ("NPPG") is clear that household projections are the starting point for identifying OAN, not the end. These projections then need to be adjusted to reflect appropriate market signals as well as other market indicators of the balance between demand and supply of dwellings (paragraph 019). The NPPG also outlines the need to take account of economic and job growth trends and forecasts (paragraph 018) and the need to take into account past under supply of housing (paragraph 015).
- 3.5.4 Unfortunately as the LP housing requirement continues to be based on only meeting demographic trend-based growth the housing requirement fails to appropriately reflect economic and regeneration potential; identified affordable housing need; or address past under-supply. The LP housing requirement is unsound as it has not been positively prepared, nor is it justified or consistent with national policy.

Economic and Regeneration

- 3.5.5 The Councils' evidence base (CD/SUS10) outlines that the LP housing requirement will support 84 new workplace jobs per annum ("JPA"). As explained within our representations this level of job growth is significantly too low to support the LP's economy policies.
- 3.5.6 Following the 14 October 2014 Informal Working Meeting relating to the calculation of housing need, the Councils' circulated updated Experian projection data. The reason for producing the update was that the Councils' previous projections were underpinned by dated ONS 2010 projections that did not reflect the 2011 Census; the ONS 2012 population projections; or the 2013 Mid Year Estimates. The updated projections also reflect improved economic conditions and post-recession trends.
- 3.5.7 The comparison of the Councils' Experian economic evidence below shows significant differences in FTE job growth over the period 2011 to 2031. An increase in 3,323 FTE jobs. A 223% increase.

Comparison of the Councils' Experian Projections (FTE Jobs 000's)

	Summer 2014 Projection			Autumn 2014 projection			Difference between Projections		
	2011	2031	Change 2011-31	2011	2031	Change 2011-31	2011	2031	Change 2011-31
West Dorset	33.69	35.42	1.73	49.01	52.83	3.82	15.32	17.41	2.09
Weymouth & Portland	16.23	15.99	-0.24	16.21	17.21	1.00	-0.02	1.22	1.24
Total	49.92	51.41	1.49	65.22	70.04	4.82	15.30	18.63	3.32

- 3.5.8 Unfortunately, the Councils' have not accordingly sought to proactively update the LP housing requirement in light of their most recent economic evidence, particularly as these projections closely align with the Councils' previous job-growth trends and other forecasting-house projections. The Councils' new evidence fundamentally demonstrates there is a significant LP housing and job imbalance.
- 3.5.9 Furthermore, the Experian projections are largely based on past economic trends. These projections do not take account of job growth potential from policy-driven economic and regeneration projects, such as those set out within the Dorset Strategic Economic Plan (an plan endorsed by the Councils'). The projections also do not take account of other committed proposals such as the Silverlake development at Crossways. Collectively these projects have the potential to create a further 5,730 FTE jobs between 2015/16 and 2020/21.
- 3.5.10 The housing requirement within the LP has had no regard to these projects. As a result, the LP runs the risk of inhibiting economic growth and regeneration as well as potentially increasing in-commuting and travel to work distances.

3.5.11 As previously referred, the LP also states (paragraph 3.2.7) that due to the aging population in-migration of economically active people will be necessary to support economic growth. The housing requirement remaining too low will constrain and limit sufficient working age in-migration.

Affordable Housing

3.5.12 It is unclear how and why the housing needs figure for Weymouth and Portland has significantly reduced from 904 dpa in the 2011 SHMA (CD/HOUSE3) to 599 dpa in the SHMA Part 2 (CD/SUS10). It is not accepted that the need for affordable housing should or would have significantly declined over that period when affordability was worsening.

3.5.13 The SHMA Part 2 applies policy assumptions to the assessment of affordable housing needs. However, the NPPG is clear (paragraph 005) that the application of policy assumptions should not be applied when determining a paragraph 47 compliant market and affordable housing OAN in full. This was also confirmed within the Gallagher homes Ltd v Solihull Metropolitan Borough Council Court of Appeal Judgement (Appendix 5 of our representations).

3.5.14 Not only is the latest assessment of housing needs unsound as it fails to comply with national policy and guidance, but as explained within our representations, the policy assumptions applied are neither locally justifiable nor evidenced. The assumptions applied also contradict conclusions made within the Councils' earlier SHMA, particularly regarding the Private Rented Sector.

3.5.15 A reasonable interpretation of the LP evidence base is that the NPPF paragraph 47 OAN of market and affordable housing is approximately 2,241 dpa between 2011 and 2031.

Past Under Supply

3.5.16 As confirmed by the Bath and North East Somerset Inspector (See Appendix 3 and 10 of our representations) it is wholly appropriate that under-supply should be rolled forward into the proceeding LP. Failure to do so renders the LP unsound, as it has not been positively prepared.

3.5.17 As explained within our representations the LP fails to address under-supply from the previous LPs. The West Dorset and Weymouth & Portland Five-Year Land Supply Report (paragraph 3.2) confirms a shortfall of 1,019 dwellings between 1994/95 and 2010/11. This significant under-supply cannot and should not be ignored.

Robust and Representative Housing Requirement

3.5.18 The NPPG outlines (paragraph 045) that once need has been assessed local authorities should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified needs, and in so doing take account of any constraints which may restrain the ability of an authority to meet its need.

- 3.5.19 The NPPF is very clear in paragraph 47 that the Government is committed to boost significantly the supply of housing. In assessing the extent to which identified housing need can be met in full, the Brighton and Hove Local Plan Inspector (Appendix 11 of our representations) concluded that the Council must leave no stone unturned.
- 3.5.20 There are no land supply, deliverability, environmental or infrastructure constraints that would limit the Councils' ability to deliver an OAN which addresses under supply; supports identified economic growth and regeneration potential in full; while also proactively making a significant contribution towards meeting affordable housing need. The LP is therefore unsound as it has not been positively prepared, nor is it justified, effective or consistent with national policy.

3.6 Is the phasing regime and housing trajectory realistic, appropriate and deliverable and capable of providing an adequate supply of housing land?

Years 2014/15 to 2016/17

- 3.6.1 Within the first three monitoring years from adoption, the LP phasing regime fails to provide an adequate supply of deliverable housing land to meet, as previously referred, identified housing needs in full, or address under-supply.
- 3.6.2 As explained within our representations, to address previous LP under-supply, deliver appropriate housing to support identified economic and regeneration potential and make a proactive contribution towards meeting affordable housing needs, a NPPF paragraph 154 aspirational but realistic upper limit within the HMA is considered to be approximately 1,300 dpa.
- 3.6.3 The housing trajectory for this period should be accordingly increased through the allocation of additional suitable and deliverable housing sites, such as the Woodsford Farms sites at Crossways.

Years 2017/18 and 2018/19

- 3.6.4 Within monitoring years 2017/18 and 2018/19 the LP housing trajectory includes delivery assumptions, which are wholly unreliable and unjustified. Delivery of 1,400 and 1,600 dpa is not credible or justified. For the LP to be effective the housing trajectory for these two monitoring years must be reduced to 1,300 dpa. The reduced trajectory for these years should be rolled over into years 2019/20 to 2023/24.

Years 2019/20 to 2023/24

- 3.6.5 We broadly support the LP trajectory for years 2019/20 to 2023/24. As explained within our representations to deliver appropriate housing to support identified economic and regeneration potential and make a proactive contribution towards meeting affordable housing needs the LP housing requirement should be approximately 1,000 dpa.

Years 2024/26 to 2027/28

- 3.6.6 As previously referred, once under-supply has been addressed the LP housing requirement should be at least 1,000 dpa. The housing trajectory for this period should be accordingly increased through the allocation of additional suitable and deliverable housing sites, such as the Woodsford Farms sites at Crossways (if not allocated to address the shortfall in the first five year period).

Years 2028/29 to 2030/31

- 3.6.7 Despite the Councils' evidence base (namely CD/SUS10) identifying housing and economic needs in the period 2028/29 to 2030/31 (albeit as previously referred the level of growth identified is significantly too low to meet housing and economic needs in full) the LP fails to make any provision at all within this period.
- 3.6.8 For the LP to be sound the housing trajectory should be accordingly extended (to deliver 1,000 dpa) through the allocation of additional suitable and deliverable housing sites, such as the Woodsford Farms sites at Crossways (if not allocated to address the shortfall in the first five year period).

3.7 Would the LP provide a 5-year housing land supply on adoption having regard to the need for an appropriate buffer (NPPF 47)?

- 3.7.1 Even against the LP housing requirement which, as previously referred and explained within our representations is significantly too low, the LP from adoption, contrary to paragraph 47 of the NPPF, would only have at best 4.33 years supply of housing.
- 3.7.2 The NPPG states (paragraph 035) that local planning authorities should aim to deal with any under-supply within the first five years of the plan period where possible.
- 3.7.3 As previously referred the Councils' have failed to proactively address under-supply from their previous LPs. The West Dorset and Weymouth & Portland Five-Year Land Supply Report (paragraph 3.2) confirms an under-supply of 1,019 dwellings between 1994/95 and 2010/11.
- 3.7.4 In addition, the Councils' housing trajectory includes delivery assumptions that are wholly unreliable and unjustified. The supply trajectory in years 2017/18 and 2018/19 should be reduced to 1,300 dpa. This results in a five-year land position against the LP housing requirement (which is fundamentally too low) of only 4.0 years.
- 3.7.5 The LP is therefore unsound as it fails to be positively prepared, justified, effective or consistent with national policy.

- 3.7.6 As set out within our representations, to address these fundamental soundness failures the Councils' must proactively allocate additional deliverable land, such as the Woodsford Farms sites at Crossways, within the first five-year period.
- 3.7.7 Specifically with regard to the Woodsford Farms sites, as confirmed within the Pre-Submission LP the Councils' accept the principal of residential led development on the Woodsford Farms sites as being appropriate and sustainable. The Councils' must therefore provide evidence to justify the decision to preclude the Woodsford Farms sites as strategic housing allocations to address the five-year land supply shortfall, particularly as housing completions on these sites could be achieved within the monitoring 2015/16.
- 3.7.8 We do however support the Councils' conclusion that a NPPF 20% buffer is appropriate and justified.