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Planning Policy (North Dorset)
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Our Ref MR/TRP/1875
Your Ref

Dear Sir / Madam

North Dorset Local Plan Review (Issues and Options) Consultation – Response From The Inwood Estate

This consultation response is prepared by Savills (UK) Ltd on behalf of The Inwood Estate. The submission has been prepared following an invitation by North Dorset District Council to comment on the Local Plan Review (Issues and Options) consultation document.

This letter provides responses to the specific questions set out in the consultation document. In doing so the response clearly outlines where particular proposals are considered to be sound or unsound with reference to the tests of soundness outlined in paragraph 182 of the National Planning Policy Framework (NPPF).

Q1: Is the proposed housing need figure of 366 dwellings per year appropriate for North Dorset?

Yes – This annual figure has been calculated using the standardised methodology that is likely to become national policy in 2018.

The Issues and Options document suggests that the housing need figure for North Dorset should be set at 366 dwellings per year. This figure has been derived using the ‘*standardised methodology for assessing housing need*’, which the Government has recently consulted upon as becoming the single method to be used by all local planning authorities when calculating housing requirements in their respective areas. The new methodology has not yet been adopted as national policy, however it is likely to be adopted during 2018 (albeit potentially subject to certain changes being made).

Given the clear intention by Government to introduce the standardised methodology, it seems entirely correct for North Dorset District Council to adopt the current iteration of this methodology for calculating housing needs for the purposes of the Local Plan Review. Taking this approach will ensure that the Local Plan Review is consistent with the requirements of national policy as required by paragraph 182 of the NPPF.

In the event that the methodology is amended prior to its publication, or in the unlikely event that Government determines not to adopt the standardised methodology, NDDC can review its approach to calculating housing needs.



Q4: Should the existing spatial strategy be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

Yes – Stalbridge is a sustainable settlement capable of accommodating a greater level of growth than currently allowed by the LPP1. This approach will also facilitate increased housing provision to meet NDDC's increased housing requirements.

The adopted Local Plan (LPP1) sets an annual housing target of 285 dwellings per year. This target is set to increase to around 365 dwellings per year, which is an increase of 22% and represents a rate of delivery far above the average rate experienced over the last 12 years in North Dorset. Therefore, if there is to be any chance of achieving the new annual target of 365 dwellings, NDDC must explore all possible ways to facilitate a significant step change in housing delivery. The Local Plan Review has a significant role to play in this respect.

Between 1995-2006 the average rate of delivery in North Dorset was 381 dwellings per year. Of these 254 dwellings per year were delivered at the District's four main towns (Blandford, Sturminster Newton, Shaftesbury and Gillingham), while 127 dwellings per year were delivered elsewhere including at Stalbridge, the villages, barn conversions etc. In the years since then NDDC has adopted a policy approach which sought to limit development in Stalbridge and the rural areas in favour of a greater focus upon development at the four main towns. This approach can still be seen within the current LPP1 which treats everything outside of the four main towns as 'open countryside'. Consequently, since 2006 the average rate of housing delivery has markedly dropped to 257 dwellings per year, which is a drop of 124 (32.5%) compared to the preceding 11 year period.

It is relevant to note that in recent years the district has become increasingly reliant upon a relatively small number of national and regional house builders, while the contribution of small and medium sized builders (SMEs) has dropped off significantly. This is because the supply of smaller sites, which tended to come forward at Stalbridge and the smaller villages, were for the most part no longer permitted and this effectively squeezed out the SMEs; many of which no longer operate in the district.

Put simply, to meet the challenge of increasing average housing supply by some 31% in future years (from 254 to 366 dwellings per annum) while remaining focussed on only the four main towns will require a paradigm shift in the appetite of national and regional builders to increase their rate of delivery in these areas. This is considered to be highly unrealistic as these builders have demonstrated that they will on average deliver far below this number at the four main towns.

It is therefore important that NDDC alters its delivery strategy so that a greater number of new homes are allowed to come forward at Stalbridge and other rural settlements. This will encourage the SMEs back into the district and help to boost housing supply.

In addition to boosting housing supply to meet the district's increased housing requirement, it is considered that allowing increased rates of housing development at Stalbridge and other villages is important for the sustainability of those settlements. When the supply of housing (both open market and affordable) in rural settlements is constrained in the way that it has been, the effect is that local people, particularly the young and family households, find it difficult to secure access to appropriate housing (for rent or purchase) at a price they can afford within their own communities. These households are inevitably forced to move outside of their home communities to find housing they can afford. This is to the detriment of North Dorset's rural communities, which have experienced a significant decline in younger household which have gradually been replaced by older, wealthy households as house prices have continued to rise. This is an issue recognised within the NPPF which states a paragraph 55 that

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."

The Government's National Planning Practice Guidance (NPPG), at Paragraph: 001 Reference ID: 50-001-20160519, takes this further where it states:

- *“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.*
- *A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.*
- *Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so 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. A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan and the plan proposal meets the basic conditions.” [own emphases].*

As such there is a clear policy set by Government that local planning authorities should be seeking to facilitate appropriate levels of new housing development at all rural settlements in order to boost their sustainability. As such, the Council’s proposal to direct a greater level of growth to Stalbridge, in addition to the four main towns, is supported as it better reflects the thrust of national policy. It is therefore consistent with paragraph 182 of the NPPF.

Q22: Should the current cap of 9 dwellings for rural exception sites be removed to allow larger schemes to come forward?

Yes – Removing the cap will enable a greater number of affordable homes to be delivered to meet local needs.

At present NDDC places an upper limit of 9 dwellings upon proposals for development at rural exception sites. This cap is takes no account of local needs or the capacity of a particular settlement/site to accommodate new development. It stands to reason that a site which is well related to the built-up area of Stalbridge (or indeed other settlements) and within walking distance of the services and facilities it provides could represent a sustainable location for in excess of nine dwellings. However, under the current policy, this type of site is prevented from doing so.

The current policy is far too simplistic to achieve its desired outcome. Rather than setting a cap in this manner, the local planning authority should judge individual proposals on their planning merits taking account of issues such as landscape impact, impacts upon the character of a settlement, access to facilities and of course the benefits associated with providing new affordable homes. If such an assessment finds that a site is capable of delivering 10 or more dwellings without causing unacceptable harm then this should be supported, rather than contriving to keep the number of dwellings below an arbitrary cap. Conversely, if a proposed development of any scale is judged to be unacceptable, planning permission can still be refused if it does not satisfy other policies in the Local Plan. As such a fixed upper limit is not needed to safeguard the character of places and so the cap of nine dwellings should be removed.

The removal of the nine dwelling cap is considered to be consistent with national planning policy and represents an effective method by which to meet the district’s significant affordable housing need. This change is therefore consistent with paragraph 182 of the NPPF.

Q24: Should the Council continue to allow a small number of open market homes on rural exception sites?

Yes – This policy is critical to ensuring that such developments are financially viable.

The Issues and Options document suggests that NDDC may no longer support the provision of a small number of open market dwellings on exception sites. This suggestion is justified in the supporting Sustainability

Appraisal, which states that it is “*unlikely that preventing cross subsidy would result in affordable housing sites not coming forward*”.

It should be noted that the above statement is not supported by any evidence relating to the financial viability of 100% affordable housing schemes. However, such evidence is clearly an essential requirement when considering such a fundamental policy change. Despite the above claim by NDDC, the reality is that in many cases proposals for 100% affordable housing schemes have a zero value or a negligible value which renders them financially unviable. Where this is the case affordable homes will simply not be delivered as there is no incentive for a landowner / developer to do so. This is why the Government introduced a requirement for local planning authorities to always consider allowing a proportion of open market housing as part of the mix on exception sites, in order to facilitate the delivery of affordable homes through cross subsidy. This is set out in paragraph 54 of the NPPF, which states that:

“Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.”

As such any proposal to alter this policy would be contrary to national planning policies and would be unsound. Furthermore, such a change is fundamentally unnecessary as the current policy only allows for a proportion of open market dwellings to be included in situations where it can be proven that a 100% affordable housing scheme would not be financially viable. Thus it provides the flexibility to ensure that all schemes are (or can be made to be) viable. It also means that NDDC is not obliged to allow market homes as part of the mix if an applicant cannot demonstrate that it is needed to make a 100% affordable housing scheme viable.

The retention of this policy mechanism will ensure the Local Plan remains compliant with national planning policy and will help to support the delivery of affordable homes across the district. This proposal is therefore consistent with paragraph 182 of the NPPF.

Tourist Accommodation in the Countryside

The Issues and Options consultation document does not propose to make any amendments to the current policy in respect of tourist accommodation in the countryside. It is considered that this is inappropriate and that this policy should be reviewed as part of the Local Plan Review process.

Policy 31 of the LPP1 states that proposals for new tourist accommodation in the countryside should be strictly controlled unless it would be provided within existing buildings or if it can be proven to be needed to support an existing rural enterprise. The justification for this policy approach seems to be based on a rather narrow interpretation of national policy set out in paragraph 28 of the NPPF, but does not take account of more recent national guidance provided by the NPPG at Paragraph: 007 Reference ID: 2b-007-20140306. This guidance requires local planning authorities to, among other things, “*consider the specific needs of the tourist industry, including particular locational or operational requirements*”.

There has been a dramatic increase in domestic tourism (staycations) in recent years for a number of reasons, not least the weakening of the pound compared to other global currencies. This has seen demand for camping and glamping holidays increase significantly, particularly in countryside locations. Although some tourists will visit camping/glamping sites on the edge of towns and villages, a significant proportion will deliberately seek out locations that are remote from built up areas. This naturally requires a countryside location; something which is thus a specific need of this particular sector of the tourist industry.

Rather than placing an in-principle objection upon all such developments in the countryside, it is considered that policy 31 should be amended to support such developments where they are appropriately located and where it can be demonstrated they would not adversely impact the character and appearance of the landscape. Such facilities can provide an important contribution to the economic vitality of the district by helping to provide diversified streams of income for agricultural and other rural enterprises, encouraging increased visitor numbers at local attractions and by encouraging increased spending elsewhere in the local economy (shops, cafes, restaurants etc.).

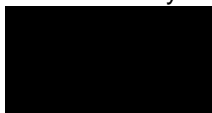


Conclusions

I trust North Dorset District Council will consider fully the points raised in this consultation response and take them into account as it continues with the Local Plan Review process.

Should you wish to discuss further any of the points raised in this submission then I would invite you to contact me using the details provided above.

Yours sincerely



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Senior Planner