

NORTH DORSET LOCAL PLAN 2011 – 2026 PART 1 EXAMINATION

HEARING STATEMENT

ISSUE 4

Meeting Housing Needs, including affordable housing and the needs of gypsies, travellers and travelling showpeople

March 2015

Question 4.1: Although not explicitly stated in LP1, I interpret the figure of 4,200 dwellings (280 dwgs a year) as being the Council’s objectively assessed housing need for 2011 – 2026. Is this figure justified, bearing in mind it is lower than that proposed in the former Regional Strategy? What has been the role of household projections in estimating overall housing need (see PPG paragraph 015 under Housing and Economic Development Needs Assessments)?

- 1.1 The 2012 SHMA Update (MHN005) identifies a need for 273 dwellings per annum (dpa), based on demographic projections. As outlined in paragraph 5.13 of the Local Plan Part 1 (LP 1) a small vacancy rate has been applied to this figure to give an objectively assessed need for 280 dpa (or 4,200 dwellings for the period from 2011 to 2026). The Council has planned to meet in full this objectively assessed need in LP 1, in line with paragraph 47 of the NPPF.
- 1.2 Following consultation on the focused changes to LP 1, the Council changed its strategy for Blandford resulting in a net increase in capacity of 150 dwellings. As paragraph 5.25 of LP 1 (as revised) points out, this gives a *“housing provision figure of about 4,350 homes in North Dorset by 2026 (which is slightly above the identified need for about 4,200 homes).”*
- 1.3 For the South West, the revised Regional Spatial Strategy (RSS) was not adopted prior to the abolition of regional planning. The revised RSS was published as a draft in 2006 and included an average housing target of 255 dpa over the period 2006 to 2026 (290 dpa over the period 2006 to 2016 and 220 dpa over the period 2016 to 2026). The figure of 280 dpa in LP 1 is clearly higher than the average 255 dpa figure for the period 2006 to 2026 identified in the draft RSS.
- 1.4 In July 2008 the Secretary of State produced proposed changes to the draft revised RSS and this suggested a figure of 350 dpa for North Dorset. However, regional planning was abolished before the revised RSS was adopted.
- 1.5 After the 2010 election, the Coalition Government signalled their intention to revoke regional strategies handing the power for decision making back to local councils. In the light of the uncertainty created by this intention, and in the absence of up-to-date evidence, the Council produced an Interim Position Statement on Housing Provision and Housing Land Supply (COD033).
- 1.6 Doubt was cast on the validity of the housing numbers in adopted or well-advanced RSSs, suggesting that earlier estimates were a more appropriate assessment of need. Paragraph 9 of COD033 states *“In Open Source Planning the Conservative Party indicates that it considers the figures used in draft RSSs (the so-called ‘Option 1 numbers’) to be “a reasonable assessment of housing need, including affordable housing”*. It also states that *“we therefore expect that these Option 1 numbers will be used by local authorities as the base-line for the projections”* and that they *“will*

be used as provisional housing numbers in their Local Development Frameworks until new local plans are completed”.

- 1.7 On that basis, the Council used the figures in draft RSS as the ‘starting point’ for the review of housing numbers in the District, rather than the figures in the RSS Proposed Changes. These earlier figures were also used as the basis for calculating housing land supply from April 2011 onwards, which was the end of the plan period for the 2003 Local Plan. The Interim Position Statement (COD033) indicated that *“this approach will continue until new housing numbers are formally established and / or included in a revised version of the New Plan for North Dorset.”*
- 1.8 As set out in the Council’s response (INS008) to the Inspector’s Question 3 (asked on 13th January 2015), the Local Authorities in Dorset jointly produced a SHMA in 2008. This established that North Dorset falls within the Bournemouth and Poole HMA.
- 1.9 The DCLG 2011-based interim household projections are the most up-to-date household projections available and they suggest a housing requirement of 175 dpa for North Dorset. However, these projections factor in pre-2011 Census estimates of migration and household formation rates that were declining due to declining affordability. The 2011 household projections are therefore thought to underestimate likely projected growth in households over the 10-year period to 2021.
- 1.10 The objectively assessed housing need figure of 280 dpa was taken from the 2012 SHMA Update (MHN005). This document used the 2008 CLG household projections, which largely pre-date the recession, rebased to 2011 using Council Tax records to give a more realistic picture of the number of households in 2011. This approach has been tested most recently in the East Dorset and Christchurch Local Plan examination and therefore is considered to be the most up-to-date and reliable estimate of housing need available for North Dorset.
- 1.11 In accordance with the PPG (paragraph 015 under Housing and Economic Development Needs Assessments), the most recent DCLG 2011-based interim household projections were considered in the process of establishing the objectively assessed housing need for North Dorset. However, as these are widely considered to underestimate household formation rates, the DCLG 2008-based household projections, which largely pre-date the recession, have been used as the starting point for the estimate of housing need.

Question 4.2: NPPF paragraph 47 requires the supply of housing to be boosted significantly. Between 2001 and 2011, 370 dwellings per annum were built in the District. The figure now proposed is 280 dwellings a year. Is the Council’s target justified and sufficiently aspirational, in light of past rates of housing provision, including in terms of affordable housing provision? (see also question 4.12 below)

1.12 The Council’s view is that household projections and the objectively assessed need for housing should provide the basis against which any boost to housing supply should be considered, rather than past rates of housing delivery. It is also inappropriate to consider any boost to housing supply in North Dorset against past rates of housing delivery; as such historic rates were based on unsustainable levels and patterns of housing development, as tested at a major call-in inquiry.

1.13 The first bullet point of NPPF paragraph 47 states that:

“To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to delivery of the housing strategy over the plan period;”

1.14 Rates of housing delivery over the 10-year period from 2001 to 2011 have been at an average of about 370 new dwellings per year. This was against a Local Plan target of 347 dwellings per year between 2003 and 2011. Over this period it was recognised that North Dorset was delivering significantly above the planned rate to such an extent that with four years still to run before the end of the Local Plan period, completions and extant commitments accounted for more than the total plan target of 5,900 dwellings.

1.15 On 4th October 2005, the Secretary of State ‘called-in’ the application for the development of Land East of Shaftesbury, including 670 dwellings. The reasons given for this ‘call-in’ which are relevant to this statement, were:

- whether the proposed development was in accordance with regional planning guidance (RPG10), including guidance on rural areas and that the main focus of development should be at Principle Urban Areas;
- whether the proposed development was in accordance with the Structure Plan and the Local Plan;
- whether the proposal was consistent with the emerging RSS and the consequences for the appropriate scale and distribution of development in North Dorset; and
- the extent to which the proposed developments are consistent with Government policies in PPG3 with particular regard to:

- whether there is a need for the proposals at this time;
 - whether the proposals would contribute to long term sustainable patterns of housing growth.
- 1.16 The main relevant conclusion from the inquiry suggested that the *“phased release of housing... ..would not conflict with the housing supply provisions in the development plan nor exacerbate the historic oversupply of housing elsewhere in the District.”*
- 1.17 It was recognised by the Inspector that there was a significant oversupply of housing in the rural areas and that the focus of housing on the main towns, in accordance with RPG 10, was therefore being undermined by this oversupply. The Inspector also recognised that the housing requirement in the draft RSS was *“significantly below recently planned and historical actual levels of provision due to the absence of PUA’s or ODCGs in the District which is a rural area with limited number of Market Towns meeting local needs.”*
- 1.18 The Council took an active approach to manage the supply of housing by adopting its Managing Housing Land Supply Supplementary Planning Document (SPD) (COD037). This SPD sought to control the supply of housing outside the four main towns, re-establishing more sustainable patterns of growth in line with RPG10 and the emerging RSS.
- 1.19 Paragraph 47 of the NPPF sets out that to boost the supply of housing, evidence should be used to ensure that the full objectively assessed housing needs are met. The starting point for establishing housing need is the DCLG household projections (PPG Paragraph 15). As stated above, the most up-to-date DCLG household projections are the 2011-based interim projections. These projections suggested a household figure of 175 dpa, although this figure is recognised to be suppressed due to declining affordability.
- 1.20 The housing requirement figure in LP 1 (280 dpa) is based on the 2012 SHMA Update which estimated the objectively assessed housing need as 280 dwellings per annum. The Council is therefore meeting in full the objectively assessed housing need as established through the most up-to-date and tested evidence. This is considered to be the appropriate basis against which any boost to housing supply should be considered, rather than past rates of housing delivery.

Question 4.3: Is the inclusion of North Dorset District within the boundary of the Bournemouth/Poole Housing Market Area (HMA) justified? What are the consequences of the use of the HMA boundary, particularly for the northern part of the District?

- 1.21 Extensive analysis of the housing markets in Dorset was completed for the 2008 SHMA (MHN006). This built upon the work undertaken at the regional level to inform the production of the South West Regional Spatial Strategy.

- 1.22 Analysis of migration data, transport links, hospital and school catchments indicated that the 'functional' HMA area extended over the majority of North Dorset with the District being split in a north / south pattern. The northern part of the District was considered to be influenced by the Yeovil HMA whilst the southern part was functionally part of the Bournemouth/Poole HMA.
- 1.23 Government guidance¹ at the time of the preparation of the SHMA was to adopt "*a pragmatic approach that groups local authority administrative areas together as an approximation for functional sub-regional housing market areas*".
- 1.24 Based on the evidence collected as part of the 2008 SHMA and in the light of the advice from the Government, it is considered that including North Dorset within the Bournemouth/Poole HMA is the most appropriate strategy for assessing housing needs through the SHMA process.
- 1.25 Across the HMA, housing need has been assessed on a local authority wide basis and therefore it considered the growth in population from all areas on an even basis. However, with regards to the proposed distribution of housing across the District, the distribution has been based on the consideration of a number of factors including the constraints to development.
- 1.26 The part of the District which is functionally part of the Bournemouth / Poole HMA is covered by the two AONB. Within this area is the town of Blandford and a number of small villages. Approximately 44% of the District's population live within this area.
- 1.27 Approximately 56% of the District's population live within the part of the HMA that looks more towards Yeovil. Within this area there are fewer constraints to development and a large number of small to medium-sized villages. In addition there are the three main towns of Gillingham, Shaftesbury and Sturminster Newton.
- 1.28 The strategy behind the distribution of growth across the District is to direct growth towards the less constrained north where there is the potential for economic and housing growth. In the south, commuting flows to the conurbation are recognised as being an issue and hence a lower level of residential growth in this area is an attempt to manage this trend. This is considered to be the most appropriate strategy given the available evidence and having regard to the opportunities and constraints in the area.

¹ DCLG Identifying Sub-regional Housing Market Areas, Advice Note, March 2007

Question 4.4: Is the Strategic Market Housing Assessment (SHMA) sufficiently up-to-date and does it reflect the guidance on SHMAs in the NPPF (paragraph 159) and Planning Practice Guidance? The 2011 SHMA Update concluded that overall need for housing in the District has reduced from 350 to 280 dwellings per annum since 2008 (paragraph 4.29 of MHN001), the reason given is the economic downturn. However there is evidence that the economy is recovering so can the up-dated SHMA (2012) be relied upon, bearing in mind the current economic context?

- 1.29 The SHMA produced for the Bournemouth/Poole HMA was first produced in 2008 jointly by the local authorities in the area. The update to this commenced in 2011 to produce the 2012 SHMA Update which established a housing requirement of 280 dpa, based on DCLG household projections. The SHMA Update was produced in accordance with the Government guidance at the time. This 2012 SHMA Update is considered to be the most up-to-date and robust SHMA available and the approach taken within the assessment has been supported at the recent East Dorset and Christchurch Local Plan examination (as set out in INS008).
- 1.30 The 2012 SHMA Update recognised the changes in the housing market of the area and identified the link with the 'credit crunch' that arose out of the economic downturn. However, the approach to the demographic estimates of housing need have not been based on the trends observed over the economic downturn.
- 1.31 The 2012 SHMA Update was largely based on the 2008-based household projections produced by DCLG. These figures were 're-based' to mid-2011 to provide an estimate of households at this point in time. This re-basing was achieved using Council Tax data. The approach then used the pre-recessionary assumptions behind the 2008-based household projections to estimate the future household need. A small (2 to 3% across the HMA) vacancy rate was applied to convert households into a housing requirement.
- 1.32 Since the production of the 2012 SHMA Update, the NPPF and the Planning Practice Guidance (PPG) have been released giving more detail on how a SHMA should be produced. In addition, the Local Authorities across the HMA have been progressing their plans through examination which made the production of a new SHMA report across the HMA, impractical.
- 1.33 The 2012 SHMA Update, produced on an HMA wide basis, gives information on the level of housing needed as a result of migration and demographic change. It then goes on to identify the need for affordable housing including in terms of quantum and tenure. An estimate is made of the demand for certain sizes of dwellings that may be needed and consideration was given to the needs of particular groups. In this respect, it is considered to be broadly compliant with the guidance in the NPPF and the PPG.

- 1.34 It is recognised that there is a need to produce a new SHMA reflecting more closely the PPG and NPPF and to reflect the current conditions in the housing market. In addition, there is a need for new demographic information to be taken into account.
- 1.35 A new SHMA is being prepared across the Bournemouth / Poole HMA. This will be compliant with the most up-to-date guidance and will, once they have been published, include consideration of the DCLG 2012-based household projections. The results of this new SHMA will therefore consider the implications of the economic recovery.

Question 4.5: Is the Strategic Housing Land Availability Assessment (SHLAA) sufficiently up-to-date?

- 1.36 The North Dorset Strategic Housing Land Availability Assessment (SHLAA) was first published in February 2009 and was based on the most up-to-date guidance at the time. A joint methodology was adopted by all local authorities across the HMA. It was decided that new sites submitted to the Council would be assessed on an ad-hoc basis with a new report being prepared as and when it was considered necessary or feasible to do so.
- 1.37 Following the publishing of this report, several changes to national policy were implemented. It was agreed across the HMA that there was a need to update the published SHLAA reports to reflect these changes. This updated SHLAA was published in August 2011. The sites that were assessed as part of this review were published via the Council's website in an interactive format. When new sites were assessed, the on-line mapping was updated to reflect the most up-to-date position.
- 1.38 The most up-to-date mapped information for each assessed site was published with a base date of 31st March 2012. In addition, the five-year supply information has been published on an annual basis in the Council's Annual Monitoring Report (AMR) with the latest information being published in January 2015 with a base date of December 2014. This information is considered to be sufficiently up-to-date

Question 4.6: Can the Council demonstrate a 5-year supply of housing plus appropriate buffer; and locations for growth for years 6 to 10 and 11 to 15 (NPPF paragraph 47)?

- 1.39 Information on the five-year supply of housing is set out in the 2014 AMR (IMP006*). This information sets out that there are 2,060 dwellings which are anticipated to be delivered within five years. This includes a small allowance (32 dwellings in total) for agricultural and other occupational dwellings, the change of use of offices to dwellings and the change of use of agricultural buildings to residential.
- 1.40 Completions in 2011/ 12 exceeded the 280 dpa target, but completions in the past two years have been below that level resulting in a small shortfall in housing

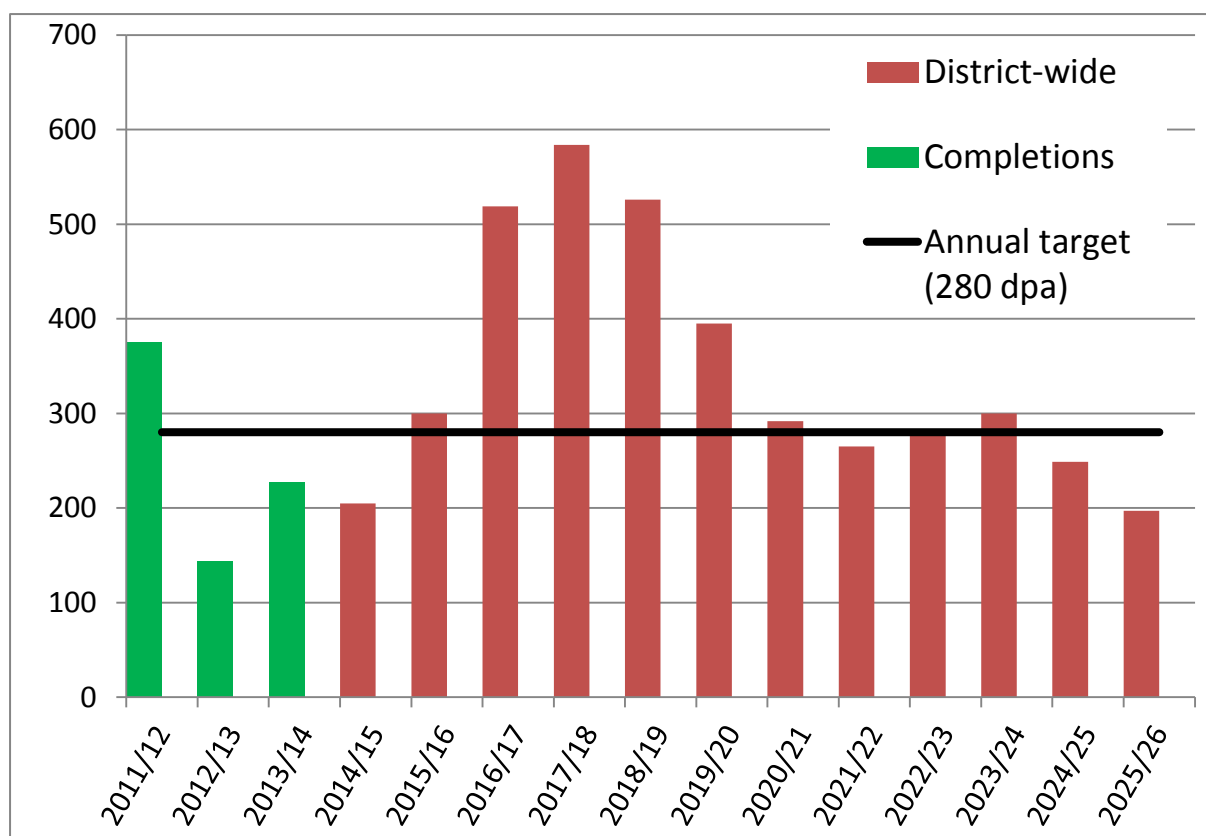
provision since 2011 of 94 dwellings. However, a longer term view of past delivery shows levels of provision significantly above target. Against the previous target of 5,900 dwellings for the period from 1994 to 2011, the Council delivered a total of 6,708 dwellings, an oversupply of 808 additional dwellings (14%). More detailed commentary reviewing performance against the policies and targets in the 2003 Local Plan is set out in Section 4 of the 2011 AMR (IMP003).

- 1.41 The NPPF (paragraph 47) indicates that the five-year supply of sites should be updated annually and should include a 5% buffer *“to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, Local Planning Authorities should increase the buffer to 20%”*.
- 1.42 Having regard to past delivery in North Dorset since 1994, the buffer that should be applied to North Dorset is 5%. With the housing requirement in LP 1 being 280 dpa, the five-year supply figure would be 1,400 dwellings. Adding in the cumulative shortfall over the past three years would increase this total to 1,494 dwellings and applying the 5% buffer would increase the five-year requirement further to 1,569 dwellings, or 314 dpa.
- 1.43 Against a five-year requirement of 314 dpa, the 2,060 dwellings anticipated to be deliverable within five years, give a supply of 6.5 years (or a surplus of 491 dwellings over the 1,569 dwelling requirement), factoring in the shortfall in delivery since 2011 and a 5% buffer.
- 1.44 Over the whole plan period (2011 to 2026), sufficient locations for growth have been identified to deliver approximately 4,350 dwellings. This is equivalent to approximately 15.5 years of supply or in other words, sufficient land to deliver housing for the 6 to 10 and 11 to 15 year periods. (see also response to Question 4.9)

Question 4.7: Why is there no housing trajectory included within the plan or a clearly expressed housing implementation strategy (NPPF paragraph 47)? (see also question 12.1 on monitoring)

- 1.45 The Council has not included a housing trajectory in LP 1 as such data becomes out of date very quickly. The Council’s view is that the AMR is a better place to publish an up-to-date housing trajectory alongside information on the five year supply. This information would be published on an annual basis and kept up-to- date.
- 1.46 If it is considered that a housing trajectory should be included in LP 1 in order to comply with the NPPF, then the most appropriate place would be within Chapter 11 Implementation. Figure 1.1 below shows the trajectory that could be included.

Figure 1.1: Proposed Housing Trajectory for insertion into the Local Plan



- 1.47 In accordance with paragraph 47 of the NPPF, the strategy for delivering the full range of housing is included within Policy 7 – Delivering Homes. In addition, the delivery of housing, and other objectives, will be monitored through the framework set out in Chapter 11 of LP 1. The implementation plan for the Local Plan includes the provision of a mechanism by which action can be taken if performance falls below the target rates of delivery. This could include one of the objectives of the Local Plan not being met.

Question 4.8: Is the Council’s approach towards taking into account vacancy rates and second homes, in the overall housing figures, reasonable and justified?

- 1.48 The vacancy rate applied to the household information in the 2012 SHMA Update (MHN005) is derived from DCLG data published in the Live Tables on Dwelling Stock. Data from these Live Tables showed a decrease in vacancy rates across the HMA of 570 dwellings over the period 2007 to 2010, a trend consistent with the national picture. However over the same period, the rate of vacant dwellings in North Dorset rose slightly. In 2010 there were 989 vacant dwellings in North Dorset out of a total stock of 30,100 dwellings, equal to a 3.3% vacancy rate.
- 1.49 The current data and trend suggests that the vacancy rate for North Dorset reached a peak at 3.3% in 2010 and has since returned to a lower rate of 2.8% in 2013. The average over the last 10 years of available information has been 3.0%. The average

vacancy rates for North Dorset and England over the last 10 years are set out in Figure 1.2 below.

Figure 1.2: Vacancy Rate²

Year	Date of data	North Dorset			England		
		Vacant dwellings	Total dwellings	Vacancy rate	Vacant dwellings	Total dwellings	Vacancy rate
2004	01-Nov	782	28,020	2.8%	710,935	21,684,000	3.3%
2005	10-Oct	874	28,540	3.1%	723,509	21,870,000	3.3%
2006	09-Oct	966	29,120	3.3%	744,931	22,073,000	3.4%
2007	08-Oct	836	29,420	2.8%	763,319	22,288,000	3.4%
2008	06-Oct	896	29,640	3.0%	783,119	22,511,000	3.5%
2009	05-Oct	889	29,880	3.0%	770,496	22,694,000	3.4%
2010	04-Oct	989	30,100	3.3%	737,147	22,839,000	3.2%
2011	03-Oct	970	30,400	3.2%	719,352	22,976,000	3.1%
2012	01-Oct	875	30,770	2.8%	704,357	23,111,000	3.0%
2013	07-Oct	875	30,920	2.8%	635,127	23,236,000	2.7%
Average rate 2004 to 2013				3.0%			3.2%

- 1.50 Based on the information that was available at the time, the vacancy rate of 3.3% is considered to be a reasonable rate to use and the most appropriate to use in the production of the 2012 SHMA Update. The approach in the 2012 SHMA Update has also been supported by the Inspector of the East Dorset and Christchurch Local Plan.

Question 4.9: Should the contribution that existing commitments and potential windfalls make to overall housing provision over the plan period be clarified?

- 1.51 Following the submission of LP 1, the contribution that completions, commitments and windfalls have made to housing land supply has been calculated, as set out in Figure 1.3.

² DCLG Live Tables on Dwelling Stock

Figure 1.3: Sources of housing supply over period 2011 to 2026

	Blandford	Gillingham	Shaftesbury	Newton	Sturminster villages	Stalbridge + villages	Total
Completions	209	31	401	17	88		746
Permissions	327	117	260	24	316		1044
Greenfield Allocations	485	1164	642	235	0		2526
TOTAL	1021	1312	1303	276	404		4316
Infill	36	240	15	108	0		399
Windfall						102	102
Neighbourhood Plans						42	42
Overall Total	1057	1552	1318	384	404	144	4859

Completions

- 1.52 This table includes completions, which are dwellings that have been constructed since 2011.

Permissions

- 1.53 'Permissions' may include some sites with resolution to grant consent, but where permission has yet to be formally issued. Permissions for Stalbridge and the villages have increased significantly in recent months, as developers have submitted planning applications in advance of the anticipated policy change to remove settlement boundaries.

Greenfield Allocations

- 1.54 Greenfield allocations are those sites identified within LP 1 for residential development excluding any sites (or parts of sites) that already have planning permission.

Infill

- 1.55 Infill sites are identified sites within the existing settlement boundaries of the four main towns, which do not have planning permission, but which the Council considers are likely to come forward for housing development over the plan period.
- 1.56 Typically they are sites identified in SHLAA, but the figures also include:

- an allowance for residential development (about 200 dwellings as part of a mixed-use regeneration scheme) on the Station Road site in Gillingham (as identified in the Employment Land Review – SED011); and

- an estimate of about 60 dwellings in central Sturminster Newton, primarily in the Station Road area, which is subject to the design and development brief produced by the local community (MTC012).
- 1.57 No allowance has been made for ‘unforeseen’ infill sites in towns (i.e. sites not in SHLAA or otherwise already identified) that may come forward over the plan period (for example the Council’s offices in Blandford Forum). Since LP 1 removes settlement boundaries around Stalbridge and the villages, no allowance for infill housing from this source has been made (other than the permissions already identified above).

Windfall

- 1.58 The windfall allowance is based solely on dwellings that are likely to be delivered from:
- occupational dwellings (under Policy 33): 4 dwellings per annum (dpa);
 - office to residential conversions (under permitted development rights): 3 dpa; and
 - agricultural to residential conversions (under permitted development rights): 3 dpa.
- 1.59 This gives an overall allowance of 10 dpa. However, this total has been discounted in the first few years of the supply to avoid ‘double counting’ schemes which already have planning permission (mainly occupational dwellings).
- 1.60 It is anticipated that the number of new dwellings delivered under permitted development rights, especially agricultural to residential conversions, will increase over time. It is also anticipated that additional dwellings will come forward following the proposed changes to Policy 29 to put residential re-use on an equal footing with employment and community uses. However, no allowance from these sources has been included in the supply.

Neighbourhood Plans

- 1.61 The figure for neighbourhood plans reflects proposals that are likely to come forward in the villages of Bourton, Pimperne and Shillingstone based on discussions with the relevant neighbourhood plan groups. Overall levels of delivery from neighbourhood plans over the plan period are likely to be significantly higher as other plans move forward. The figure does not include any allowance for additional housing from other neighbourhood plans or any allowance for additional sites that may be allocated for housing or mixed use through the ‘opting in’ process for LP2.

Discussion

- 1.62 The Council has always sought to maintain a robust supply of housing, both in terms of the five-year supply and over the plan period. At the start of the plan period (April 2011) it sought to ensure that the vast majority of housing could be

delivered from extant permissions and new allocations. At that time it was anticipated that infill on identified sites in the towns (i.e. from SHLAA and other sources), together with a minimum of 230 dwellings in Stalbridge and the villages would be required to ensure that the overall District-wide housing provision figure was met. At that time no allowance was made for delivery from windfall or neighbourhood plans.

- 1.63 Since April 2011 the Council has monitored completions and these have been added to the supply, with the figures for permissions being adjusted accordingly. As Figure 1.3 shows that at the current time 4,316 dwellings can be delivered from completions, permissions and allocations, which is only 37 below the District-wide housing provision figure of 4,350.
- 1.64 Completions and permissions for Stalbridge and the villages (404 dwellings) now significantly exceed the minimum figure (of 'at least' 230 dwellings) sought from this source in LP 1. As paragraph 5.26 states this figure was never intend to be a target or cap on the overall level of housing development that should take place in the countryside.
- 1.65 With the increased anticipated yield from: completions and permissions in the countryside; windfall from occupational dwellings and permitted development; and neighbourhood plans, there is now less need to rely on infill on identified sites in the towns to deliver the overall housing provision figure.
- 1.66 Of the 543 dwellings anticipated from identified infill, windfall and neighbourhood plans, only 37 need to be delivered from all these sources to meet the District-wide 4,350 figure. This is considered to be an acceptable level of risk, which gives a high degree of certainty that the overall housing provision figure for the District will be met.

Question 4.10: Is the proposed housing distribution (policy 6) based on a sound assessment of land availability and delivery? Is there any evidence that the proposed distribution cannot be satisfactorily achieved?

- 1.67 The proposed distribution of housing is based on an assessment of land availability derived from the SHLAA and informed by discussions with land owners/developers.
- 1.68 As set out in Chapter 2 of LP1, North Dorset District has a north/south divide with a dividing line running diagonally across from the north east to the south west. The northern part is characterised by a denser pattern of settlements and fewer environmental constraints whereas the southern part has a more sparse settlement pattern with the majority of the area being designated as AONB.
- 1.69 The spatial distribution of housing development focuses a greater proportion in the northern part of the District to not only reflect the lower level of constraints but also to reflect the higher population. As a result of this, there was significantly more

land put forward as being available for development by landowners through the SHLAA process in the north of the District than in the south.

- 1.70 All of the sites identified in LP1 have been subject to discussions with landowners or developers with the clear intention to develop being signalled in all cases. The Council is therefore not aware of any information that would suggest the distribution of housing growth cannot be achieved.

Question 4.11: Is the housing mix proposed in policy 7 justified? Is policy 7 too prescriptive? Should the reference in paragraph 5.34 be to bedroom numbers rather than size? Does the Council's approach meet the objectives of paragraph 50 of the NPPF, with regard to delivering a wide choice of family homes?

- 1.71 The housing mix proposed in Policy 7 is based on the evidence published in the 2012 SHMA Update (MHN004). This report evaluated the impact of natural change and migration on the age profile of the population across the HMA. It concluded that there would be a balance in demand for market housing to meet the needs of the aging population whilst still providing family housing. However, it also indicates that the emphasis should be on two and three bed housing. In relation to affordable housing the 2012 SHMA Update found that future demand is likely to be for smaller properties.

- 1.72 In relation to the *“emphasis on the provision of two and three bedroom properties”*, the Council is of the opinion that although the SHMA identified a high proportion (about 70%) of future need being in the two and three bed range, this may change over time. For this reason, it is suggested that the wording above is removed from the policy. The second paragraph of Policy 7, as amended, would therefore read:

“In the period to 2026, the Council will seek to deliver about 40% of market housing in North Dorset as one or two bedroom properties and about 60% of market housing as three or more bedroom properties.”

- 1.73 The 2012 SHMA Update is the most up-to-date evidence of the need for housing across the Bournemouth and Poole HMA. This SHMA has also been tested at examination. On this basis, and including the change proposed above, the approach set out in Policy 7 is considered to be the most appropriate strategy and is therefore justified.

- 1.74 A number of changes have been proposed to the policy (see reference 5/7/2) to offer further flexibility to the approach stating that the percentages of house sizes that will be sought are indicative of what the council will be seeking. The proposed changes also suggest that viability is a consideration that could warrant an alternative approach alongside justification through local circumstances.

- 1.75 The approach in Policy 7 is therefore considered to offer sufficient flexibility to reflect both viability issues and changes that occur due to local circumstances.

- 1.76 In paragraph 5.34 of the supporting text to Policy 7, the text should read *“in terms of bedroom numbers”* rather than *“bedroom size”*. A change to the supporting text will be required to reflect this error.
- 1.77 In relation to the provision of family homes, the NPPF paragraph 50 states that local planning authorities should:
- “plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);”*
- 1.78 The supporting text to Policy 7 sets out an approach to the delivery of homes to meet the needs of families with children. The approach to seeking larger (family) homes is derived from the 2012 SHMA Update. It sets out the starting point for negotiations on sites of 10 or more dwellings. However, it also sets out that a different approach may be permitted if local circumstances justify an alternative.
- 1.79 The policy sets out in broad terms the requirements for the size and type of housing to be provided subject to negotiation based on the most up-to-date available evidence and having regard to viability and character considerations.

Question 4.12: Bearing in mind the SHMA Up-date (MHN004) concludes in paragraph 5.7 that there is a need to provide an additional 387 units of affordable housing per annum (up to 2016), has the Council placed sufficient weight on meeting the District’s affordable housing needs? Will the Council’s policies deliver a reasonable amount of affordable housing and in the locations where need is greatest? Is the advice in paragraphs 173 and 174 of the NPPF sufficiently reflected in LP1? What is the justification for seeking a reduced provision in Gillingham?

- 1.80 The 2012 SHMA Update (MHN004) indicates the level of need for affordable housing in the District. It also highlights the important role of the private rental sector in meeting this need. The SHMA Update suggests that if attempts were made to provide all of the 387 affordable dwellings per annum, there would be significant problems with the wider housing market as significant numbers of existing private tenants move to affordable housing.
- 1.81 In addition to the need for affordable housing being met in part through the private rental sector, there are viability constraints to the provision of affordable housing through on-site provision across the District.
- 1.82 Part of the negotiations to secure affordable housing on a site will therefore include a consideration of viability. Where viability is considered to be an issue, the council will expect an ‘open book’ discussion of the issues and involve the expertise

of the District Valuer to arrive at an agreed position. Such an assessment of viability would look at all the policy requirements on a site.

- 1.83 The level of affordable housing provision at each town is based on the assessment of viability contained in the North Dorset Affordable Housing Provision and Developer Contribution Report (MHN017). This suggests that residual land values in Gillingham are lower than across the remainder of the District and therefore higher levels of affordable housing provision would not be viable. For this reason, a split target has been proposed to reflect residual land values whilst maximising the delivery of affordable housing.
- 1.84 Taking into account the role of the private rented sector and the issue of viability, the Council is seeking to maximise the provision of affordable housing whilst still seeking contributions towards the provision of infrastructure.
- 1.85 The policies in LP 1 indicate that about 1,480 additional affordable dwellings would be delivered over the plan period in the four main towns. As the four main towns are the most sustainable locations, the delivery of affordable housing in these places is considered to be the most appropriate approach. As these are also the largest centres of population, they are likely to be the locations where the greatest need will arise and in fact the SHMA Update estimated that the greatest levels of need was in Blandford and Gillingham.
- 1.86 In the rural areas, there is the opportunity to deliver affordable homes on exception sites under Policy 9 where a need is identified. In addition, through neighbourhood plans or via the opt-in route, local communities can bring forward housing including affordable housing to meet need or to deliver community aspirations.
- 1.87 The Council's view is that the framework in LP1 is sufficiently robust to deliver affordable housing having regard to viability constraints and the role of the private rented sector. The approach, reflecting residual land values, is considered to be the most appropriate given the available evidence and is therefore justified.
- 1.88 Over the past five years 43% of housing in North Dorset has been delivered as affordable housing (520 affordable homes from a total of 1,210 net additional completions). This level of delivery is above the overall level sought by Policy 8. It should be noted, however, that figures for the anticipated delivery of affordable housing in the future may need to be revised (downwards) in order to reflect both:
- the recent ministerial statement from Brandon Lewis (as discussed in more detail in the Council's response to Question 2 from the Inspector – INS007); and
 - the results of the 'whole plan viability assessment' that is currently being prepared which looks at the level of affordable housing provision cumulatively alongside other policy requirements and the need to provide infrastructure. The implications of this report for the provision of affordable housing will be considered once it is finalised.

Question 4.13: Is the Affordable Housing threshold justified and would the requirements of policy 8 put at risk the financial viability of any housing schemes? Is the policy sufficiently flexible? Is there any evidence to support making a distinction between town centre and non-town centre development? Is the reference to the involvement of the District Valuer appropriate?

- 1.89 The affordable housing threshold of three or more net additional dwellings was set on the basis of a District-wide viability study (MHN017). This put forward a number of options for the threshold (including zero, three and fifteen residential units). Whilst the Council originally proposed a threshold of zero, a subsequent position statement (COD034) has operated a threshold of three, on an interim basis, since early 2011.
- 1.90 In November 2014 the Government made changes to the PPG stating that contributions (including contributions towards the provision of affordable housing) should not be sought from developments of 10 dwellings or less and which have a maximum combined gross floor space of no more than 1,000 square metres.
- 1.91 On 13 January 2015 the Inspector asked a question relating to the ministerial statement that sits behind the changes to the PPG. The Council's response is set out in Document INS007. This states that the Council will revise Policy 8 *"to set a general numerical threshold of eleven or more net additional dwellings where development will contribute to the provision of affordable housing."* It also states that the Council will: revise the policy to include a gross floor space threshold of more than 1,000 square metres; and expand the policy to set a threshold of 6 dwellings or more in designated rural areas.
- 1.92 Whilst part of the Government's justification for the change was the viability of small schemes that has not been the Council's experience. Developers have continued to offer, or make contributions towards, the provision of affordable housing on small sites in recent years.
- 1.93 The changes the Council is now proposing as a result of the ministerial statement and the changes to the PPG will introduce a degree of flexibility (i.e. a lower threshold in AONBs).
- 1.94 The town centres of all the four main towns in North Dorset lie outside the AONBs, so the proposed new threshold of eleven or more dwellings will apply in these areas. Whilst the need to contribute to the provision of affordable housing could have had an impact on proposed schemes of three to ten net additional dwellings in town centres, this will no longer be the case with the changes to Policy 8 now proposed by the Council. Town centre regeneration schemes which involve vacant buildings or floor space will also benefit from the 'vacant building credit' outlined in

the PPG, which the Council intends to make reference to in the supporting text to Policy 8.

- 1.95 It is considered that the reference to the District Valuer is appropriate and also a helpful mechanism in resolving viability disputes. The Council has negotiated with developers on the issue of the provision of affordable housing over many years and without an independent mediator, such as District Valuer, it has often been difficult to reach an agreed position.
- 1.96 Paragraph 2.5.27 of the draft Core Strategy (COD009) indicated that the Council would use an Affordable Housing Viability Assessment Toolkit (MHN022*), developed by Three Dragons to assist in resolving viability disputes. Following the announcement of the Government's intention to revoke regional strategies, the Council produced an interim position statement on the provision of affordable housing (COD034) in January 2011. This included a review of the affordable housing policies in the draft Core Strategy and set out that the Council would offer developers the opportunity to use the District Valuer as a means of reaching a mutually agreed position on viability and potentially shortcutting disputes.
- 1.97 The interim position statement was adopted in January 2011 and has effectively enabled this element of emerging policy to be 'road tested'. Since this approach has been used successfully by the Council's Development Management Team since its introduction, it has been retained in Policy 8 of LP1.

Question 4.14: Is the affordable rent/intermediate housing split justified and in line with current evidence and is it reasonable for the Council to seek the provision of social rented housing in some circumstances (paragraph 5.105)?

- 1.98 The affordable rent / intermediate housing split is considered to be justified and in line with current evidence. Policy 8 seeks the provision of between 15 and 30% intermediate housing across the District in order to provide some flexibility over the plan period. A range, rather than a fixed percentage, has been included in the policy to reflect the sensitivity to change of the level of need for intermediate housing, as evidenced in paragraphs 5.13 to 5.16 of the North Dorset Summary of the 2012 SHMA Update (MHN004) and uncertainties about how this might change in the future.
- 1.99 The SHMA Update showed the need for intermediate housing falling from 30% in 2007 to 14% in 2012, with a corresponding increase in the need for affordable / social rent. Even within the 14% need, none of the households were found to be able to afford an equity based product due to 'very low levels of capital and current mortgage lending restrictions'. The 2012 SHMA Update is the most up-to-date evidence on the need for intermediate housing. However, the 14% figure reflects recessionary conditions, which are unlikely to continue throughout the whole plan period.

- 1.100 Whilst it might reasonably be anticipated that the need for intermediate housing will rise in the future, it is difficult to predict by how much, due to continuing changes to: national policy on affordable housing; national funding regimes for the provision of affordable housing; the availability of mortgage finance; and incentives to purchase on the open market, such as Homebuy.
- 1.101 It is reasonable for the Council to seek social rented housing in some cases. The evidence above clearly demonstrates that there are circumstances where intermediate housing is not affordable for those in housing need. This may also be the case with the affordable rent product, especially in rural areas. In rural areas market rents tend to be higher than in the towns and hence affordable rents (which are typically 80% of market rent) are also higher. Higher rents coupled with service charges and the higher costs of living in rural areas could, in certain cases, make the affordable rent product unaffordable.
- 1.102 It should be noted that the policy is worded to 'seek' social rent in certain circumstances, rather than to require its provision. Also Policy 8 and paragraph 5.105 of LP1 state that social rent provision will only be sought in certain circumstances, subject to local viability considerations, ensuring that social rent would not be sought if it was not viable for a developer and / or registered social landlord to provide it.

Question 4.15: Are the requirements of policy 9 too restrictive and unduly onerous? How would the Council exercise its discretion regarding the provision of market homes?

- 1.103 The Council does not consider that the requirements of Policy 9 are too restrictive or unduly onerous. The policy clearly explains the Council's approach to permitting rural exception affordable housing and provides guidance on how rural exception sites should be selected. It also clarifies how schemes should aim to meet identified local needs and provides advice about nominations and the control of occupancy.
- 1.104 Policy 9 supports paragraph 54 of the NPPF which explains that in rural areas councils should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.
- 1.105 Annex 2: Glossary to the NPPF defines rural exception affordable sites as "*small sites used for affordable housing in perpetuity where sites would not normally be permitted for housing that seek to address the needs of the community by accommodating households who are either current residents or have an existing family or employment connection*".
- 1.106 With regard to the provision of market homes, paragraph 54 of the NPPF highlights 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.

- 1.107 Policy 9 highlights that small numbers of market homes may be allowed on rural exception sites at the Council’s discretion. The Council will assess the number of permitted market homes on a site-by-site basis depending on the site’s individual circumstances. It also explains that proposals where the market element exceeds one third of the total number of dwellings are unlikely to be acceptable.
- 1.108 ‘Major development’ under the Town and Country Planning (Development Management Procedure) (England) Order 2010, is among other things, classed as the development of 10 or more dwellings. The Council considers that schemes should not exceed 9 dwellings in total, including any market housing element, to avoid being caught within this definition of ‘major development’. Exercising its discretion, the Council considers that larger rural exception schemes would be incompatible with the ‘small site’ aspect of the NPPF definition. Since the purpose of a rural exception site is to meet local need, usually from within a particular parish, it is unlikely that the level of need identified in an appropriate up-to-date local housing needs survey would exceed the 9 dwelling total in Policy 9 in many cases.
- 1.109 Paragraphs 5.133 to 5.142 of Policy 9 clearly set out how the Council will exercise its discretion regarding the provision of market homes on rural exception sites. They explain that the Council will only accept the principle of a rural exception site where a local need for rural exception affordable housing has been demonstrated and that a scheme cannot be justified on the basis of market housing need.
- 1.110 Where a market element is proposed as part of a rural exception housing scheme, Policy 9 makes it clear that the Council will require clear evidence and justification of the need for the market element, in the form of viability information as part of an open book assessment that can be scrutinised.
- 1.111 The policy indicates that the Council may permit small numbers of market homes on rural exception sites but only as a last resort to contribute towards closing a funding gap. Other sources of funding may also contribute to closing the gap including: grant funding; monies a registered social landlord may have collected from disposing of affordable homes elsewhere in the District; and monies the Council may have collected in planning contributions toward off-site affordable home provision. The market element must also be similar (or smaller) in size and type to the rural exception affordable homes being proposed.
- 1.112 Paragraph 5.138 provides a list of factors the Council requires to be taken into account in a viability assessment to demonstrate why a market element may be required to contribute towards funding the scheme. These factors are:
- the costs associated with providing the number of affordable units proposed;

- the costs associated with providing affordable units of a size, type and tenure that will address the identified affordable housing needs of the local community;
- the availability of any grant funding, or other source of funding to meet the costs of providing the affordable units (for example from the off-site affordable housing contributions taken elsewhere);
- the sums likely to be generated from the sale of any market units; and
- the extent to which the rental and other income from the affordable units could contribute to furnish any borrowing required to deliver the scheme.

1.113 Where a viability assessment shows that more than a small number of market units are required to make a scheme viable, then planning permission will not be granted.

Question 4.16: How do the Council define ‘in-filling’ (policy 7)?

1.114 Policy 2 - Core Spatial Strategy establishes that infilling will be permitted within the settlement boundaries of Blandford, Gillingham, Shaftesbury and Sturminster Newton, as defined in the 2003 Local Plan. All other settlement boundaries, as defined in the 2003 Local Plan will no longer be retained, which effectively means that Stalbridge and all the District’s villages will be subject to countryside policies, where no infilling is permitted. Outside the four main towns, settlement boundaries could be re-established, through the neighbourhood plan or ‘opt in’ processes to allow infilling, if a local community considered that was an appropriate approach to meeting local needs.

1.115 Policy 7 – Delivering Homes is divided into a number of sections and the section on Infilling and Residential Gardens states:

“Any infilling that takes place within the settlement boundaries of Blandford, Gillingham, Shaftesbury and Sturminster Newton, including on residential gardens, should be sensitively designed to its local context and respect the amenity of adjoining properties.

In the event that a settlement boundary is established for Stalbridge or any of the District’s villages in a neighbourhood plan, any infilling, including on residential gardens, should be sensitively designed to its local context and respect the amenity of adjoining properties.

Where settlement boundaries exist, or are created or modified in neighbourhood plans, local communities are encouraged to develop more detailed policies relating to infilling.”

1.116 Paragraphs 5.63-5.69 of the supporting text for Policy 7 summaries the Council’s approach to Infilling and Residential Gardens.

1.117 Paragraph 5.63 explains that national policy used to give priority to the use of previously developed land often referred to as the ‘brownfield first approach’ and set a national indicative minimum density standard for housing development. The

national definition of previously developed land also formerly included residential gardens (although they are now considered to be 'greenfield' sites). This former national policy framework effectively prioritised infilling within settlements including on residential gardens and reduced the weight that local planning authorities could give to more local concerns, such impacts on the character and appearance of an area, when making planning decisions.

- 1.118 Since Policy 7 relates to the delivery of homes, infilling in this context means residential development. The definition is discussed in paragraph 5.64 of LP 1. It is residential development within settlements, which are essentially, built-up areas with settlement boundaries. Paragraph 5.64 also clarifies that housing on residential gardens would fall within the definition of infilling, even though the NPPF, Annex 2 excludes private residential gardens from the definition of brownfield land. Examples of the types of development within settlement boundaries that could be considered infilling include: replacement development; regeneration; the sub-division of properties; and development on vacant plots of land, including gardens.
- 1.119 The need to designate Local Green Spaces will be considered through the Local Plan Part 2 (LP 2) or through neighbourhood plans. Since paragraph 76 of the NPPF indicates that the designation of a Local Green Space would "*rule out new development other than in very special circumstances*", infilling would not be permitted in these areas. The 2003 Local Plan identifies many Important Open and Wood Areas (IOWAs) within settlement boundaries, which are protected by 'saved' Policy 1.9. These will be reviewed through LP 2 or neighbourhood plans and some may be considered suitable for Local Green Space designation. Current IOWA designations will protect areas from infilling, but if as part of the IOWA review process, any IOWAs within retained (or new) settlement boundaries are not considered suitable for Local Green Space designation, infill development may be permitted.

Question 4.17: Has the Council properly addressed the housing needs of the elderly and people with disabilities?

- 1.120 National planning policy (NPPF paragraph 50) explains that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including among others older people and people with disabilities.
- 1.121 The aims of Dorset County Council's Extra Care Housing Strategy 2014 - 2021 are to:
- facilitate the development of appropriate new extra care housing schemes;

- facilitate, and in many cases fund, support and unplanned care services in extra care schemes; and
 - work in partnership with communities, housing authorities, housing associations and the private sector to achieve these aims.
- 1.122 The strategy explains there are several options older people can consider if their home is no longer as suitable as it once was which include people: staying at home and adapting their homes; moving to a more suitable property; or moving to a care home. It estimates that in North Dorset by 2021 there will be 9,390 people aged 75 or over, which gives rise to an estimated need for rented or shared ownership enhanced sheltered housing and extra care housing of 221 units.
- 1.123 The strategy explains that the need for 221 units (based on 22.5 units per 1,000 population equates to 10 units of enhanced sheltered housing and 12.5 units of extra care housing) and its figures are aggregated to reflect the likelihood that provision will be increased by a combination of new build development and conversion of existing sheltered housing.
- 1.124 The Council's approach to addressing the needs of the elderly and people with disabilities recognises that most people will stay in their existing homes and have them adapted them to suit their needs. Others whose care needs are beyond that which can be provided within their homes may move to care homes.
- 1.125 In terms of the provision of new extra care housing, the strategy notes that the development at Trailway Court, Park Road, Blandford Forum has provided 40 units of extra care housing in the District. The only development in the District of a significant size to warrant the provision of extra care housing is the Gillingham Strategic Site Allocation. Policy 21 sets out the requirements for a Master Plan Framework to be prepared for the site (for approximately 1,800 dwellings). Among its requirements, the Master Plan Framework makes provision for at least 50 affordable extra care units for the elderly, as part of the overall affordable housing provision.
- 1.126 These two developments will meet at least part of the need identified in the Extra Care Housing Strategy through direct provision. The strategy also anticipates that part of this need would be met through the conversion of existing sheltered housing, which will be taken forward primarily by Dorset County Council. Policy 7 also supports the provision of age-restricted housing for the elderly and the supporting text (paragraph 5.50) indicates that reduced levels of car parking and open space provision may be acceptable for schemes where higher levels of care are offered.
- 1.127 Paragraph 5.53 discusses the issue of housing for disabled people and the wording was discussed with an Environmental Health Officer in the Council. In many cases needs can be met through the adaptation of existing properties with funding obtained through the Disabled Facilities Grant (of up to £30,000 per property).

Since such adaptations do not require disabled people to move house, this is often the preferred approach.

- 1.128 The supporting text in Paragraph 5.53 also recognises that there may be an opportunity to work with Dorset County Council Social Services and Registered Social Landlords to make provision for disabled or mobility impaired people through the development of new affordable housing.
- 1.129 The Council consider its approach to providing a wide choice of quality housing properly addresses the needs of the elderly and people with disabilities as it complies with national planning policy guidance (NPPF paragraph 54) as well as taking into account the findings of the Dorset Extra Care Housing Strategy.

Question 4.18: Is the Council providing sufficient support for people wishing to build their own homes?

- 1.130 Paragraph 50 of the NPPF indicates that planning authorities should “*plan for a mix of housing based on ... the needs of ... people wishing to build their own homes.*”
- 1.131 Paragraph 25-135-20140612 of the PPG defines a self-builder as “*anybody who is building their own home or has commissioned a home from a contractor, house builder or sub-contractor.*” Paragraph 25-144-20140612 also confirms that a self-build project can be a multi-unit scheme, where “*a builder sells serviced plots.*”
- 1.132 In terms of viability, support is given to self-builders in national policy through:
- an exemption from making contributions towards the provision of affordable housing; and
 - an exemption from the Community Infrastructure Levy (CIL).
- 1.133 Paragraph 5.57 of the Submitted Local Plan established that the Council would not seek the provision of, or a financial contribution towards, the provision of affordable housing on sites for one or two net additional dwellings. The recent ministerial statement by Brandon Lewis and further changes to the PPG has now established a national threshold of eleven or more units (which can be reduced to five in AONBs).
- 1.134 Paragraphs 25-135-20140612 to 25-153-20140612 of the PPG, which were added on 12 June 2014, also establish that self-builders have been granted exemption from the CIL.
- 1.135 These measures mean that the contribution that self-builders are required to make to the provision of infrastructure have been greatly reduced and on sites of ten dwellings of less (which can be reduced to five in AONBs), there is no requirement to contribute towards the provision of affordable housing. These measures should significantly reduce the development costs for people wishing to build their own homes on such sites (including builders selling serviced plots on multi-unit schemes).

- 1.136 Since the definition of self-builders in the PPG is widely drawn, it is considered that there are significant opportunities within the overall policy framework in LP1 for self-builders to find suitable sites to build their own homes. As outlined in paragraph 5.56 of LP1 these opportunities will mainly arise from infilling in towns and replacement dwellings in the countryside.
- 1.137 The Government has introduced a new permitted development right, which allows the change of use of agricultural buildings to residential under a prior approval regime. In response to this change the Council has proposed changes to Policy 29 – The Re-use of Existing Building in the Countryside to be more permissive in relation to non-occupational residential re-use in cases where planning consent needs to be sought (see the Proposed Uses section of Policy 29 and the supporting text in paragraphs 10.170 to 10.177 of Submitted LP1).
- 1.138 The changes to permitted development rights and the proposed changes to Policy 29 (and supporting text) will provide further opportunities for self-builders.
- 1.139 The Council is aware that the Government has recently consulted on the document Right to Build: Supporting Custom and Self Build published in October 2014.
- 1.140 Within the consultation document the Government want to go further in empowering aspiring self-builders to build their own home in their local area. The Budget 2014 announced that they would consult on a new Right to Build giving prospective custom builders a right to a plot of land from their local Council and establish a number of vanguards to test the practicalities of operating the Right across England. The intention is then to legislate for the Right – through first the Self Build and Custom Housebuilding Private Members’ Bill and then legislation in the next Parliament – taking into account the outcome of this consultation and the experience from the vanguards.
- 1.141 It is considered that these measures are not sufficiently well advance to warrant a change to LP 1 at the present time.

Question 4.19: Has the Council satisfactorily considered the relationship between housing provision and employment trends (PPG paragraph 018 under Housing and Economic Development Needs Assessments)?

- 1.142 The Council, along with its partners across Dorset, produced a SHMA (MHN007) which made an assessment of the housing needs across the Bournemouth and Poole HMA and across the Dorchester and Weymouth HMA. This report was updated in 2012 (MHN005) in the light of the revocation of the South West Regional Spatial Strategy, to consider the implications of the DCLG 2011-based interim household projections and to consider the implications of the early 2011 Census results.
- 1.143 The 2012 SHMA Update considered the implications of economic growth on the affordability of housing in the District and the impact of this on household

formation rates. The SHMA Update was produced in accordance with the latest DCLG guidance on the production of a SHMA at the time of its preparation. The approach has also been supported by the inspector at the inquiry into the East Dorset and Christchurch Local Plan.

- 1.144 Since the production of the 2012 SHMA Update, the PPG has been published which gives clear guidance on how housing and economic needs assessments should be produced. In paragraph 007 of the PPG under Housing and Economic Development Needs Assessments, states that:

“Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate.”

- 1.145 It goes on to state that where plans are at a different stage in their production, local authorities *“should co-ordinate future housing reviews so they take place at the same time”*. For this reason, an HMA-wide SHMA is currently being prepared to inform the review of local plans across the whole HMA. This new SHMA will be produced in line with the guidance in the PPG and therefore will also include a more detailed consideration of the relationship between housing provision and employment trends. At the time of writing, the 2012 CLG household projections, required to inform the new SHMA had yet to be published. Following publication of the new SHMA, an HMA-wide review of local plans will take place in an appropriate time scale in accordance with Government policy as set out by the recent letter from Brandon Lewis MP dated 19 December 2014 (MHN021).

Question 4.20: Is policy 26 on sites for gypsies and travellers clear and consistent with national guidance and does it establish appropriate and reasonable criteria?

- 1.146 Policy 26 is clear in its approach to the development of sites for Gypsies and Travellers. It sets out in a straightforward list the considerations to which the Council will have regard when determining planning applications for sites which come forward, whether identified in the Dorset-Wide Gypsy and Traveller DPD or not. That document will deal with need and specific site allocations as discussed in Policy 10 of LP 1.
- 1.147 National guidance is contained in the NPPF and Planning Policy for Traveller Sites. The NPPF enshrines the principle of sustainable development and LP 1 reflects this at Policy 26(g) and in paragraphs 10.105 and 10.106 in particular.
- 1.148 The publication of Planning Policy for Traveller Sites drew together various aspects of planning policy as it related to the development of sites for Travellers. Paragraph 9 of the document refers to the identification of needs and sites which LP 1 states is being dealt with by way of the Dorset-Wide Gypsy and Traveller DPD. The document also sets out various policy requirements at paragraph 11 - policies in LP

1 dealing with these matters include Policies 4, 24 and 25 as well as Policy 26.

1.149 In summary, the requirements of Policy 26 are clearly set out, follow national guidance and are considered to be reasonable, reflecting established planning principles.