



Spatial and Community Policy
West Dorset District Council
South Walks House
South Walks Road
Dorchester
DT1 1UZ

SENT BY E-MAIL AND POST

3 April 2017

Dear Sir / Madam

**WEST DORSET, WEYMOUTH & PORTLAND JOINT LOCAL PLAN
REVIEW – ISSUES & OPTIONS CONSULTATION**

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the Councils consultation document.

Question 3-i.

The West Dorset, Weymouth & Portland Local Plan is a joint plan therefore it is appropriate to have a single vision for the area.

Question 4-i.

The Government recently published its Housing White Paper "*Fixing The Broken Housing Market*". The current consultation on the Housing White Paper includes Question 34 about proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development together with the core planning principles and policies of the NPPF (paras 18 – 219) constitute the Government's view of what sustainable development means for the planning system in England. Therefore it is not necessary for the Local Plan to include any further explanation of the meaning of sustainable development.

Questions 5-i & 5-ii

The figure of 775 dwellings per annum does not necessarily remain an appropriate figure for the objectively assessed housing need (OAHN) for West Dorset, Weymouth & Portland. The 2014 Sub National Household Projections (SNHP) indicate a 10% increase to household growth above previous projections in the Local Plan area. As set out in the NPPG (ID:2a-016-20140306) the HBF consider this percentage increase represents a meaningful change to the starting point for the calculation of OAHN which would necessitate a re-assessment. The recently published Housing White Paper also proposes a standard methodology for the assessment of housing needs which from April 2018 will be used as the benchmark for the calculation of 5 YHLS and the housing delivery test in the absence of an up to date Local Plan. Therefore the 2014 SNHP together with the Housing White Paper proposals for a standardised methodology for the assessment of housing needs suggests that the Councils should be undertaking a re-assessment rather than just projecting forward the currently adopted annualised housing requirement for a further 5 years up to 2036.

Questions 6-i & 6-ii.

It is agreed that additional growth for the period up to 2036 should be located at Dorchester, Weymouth, Bournemouth, Bridport, Lyme Regis, Portland, Sherbourne and Crossways. However the Councils should also be considering additional growth at other settlements including settlements with populations of more than 600 and 1,000 and any settlements with a defined development boundary.

Questions 6-iii & 6-iv.

It is important that the Councils maintain some flexibility within the HLS to respond quickly to changing circumstances. It is suggested that flexibility is provided for development adjacent to defined development boundaries in Policy SUS2. In providing flexibility to Policy SUS2 for development outside defined development boundaries the text to Policy SUS2 should include reference to the presumption in favour of sustainable development and HLS.

Question 6-vi.

The policy approach to settlements with defined development boundaries should be a strategic policy set out in the Local Plan with which Neighbourhood Plans should be in general conformity. There should not be any different policy approaches applied to settlements with defined development boundaries identified in the Local Plan and settlements with new defined development boundaries identified in Neighbourhood Plans. Neighbourhood Plans should be positively supporting the strategic policy approach so as not to undermine the Local Plan by promoting less development.

Questions 6-vii & 6-viii.

Policy SUS2 should refer to the settlements on Portland as the focus for growth. The settlements on Portland should be listed as Castletown, Chiswell, Easton, Fortuneswell, Grove, Southwell Wakeham and Weston. However the Councils should give further consideration to whether or not this list is set out in Policy SUS2 itself or supporting text.

Questions 7-i, 8-i & 9-i, 10i, 11i, 12i, 13i, 14i, 15i and 16i.

In all settlements the level of growth should be no less than the average rate of new dwellings per year over the last 5 years preferably the Councils should be taking a strategic longer term view of growth for each settlement respectively.

Questions 7-ii, 8-ii & 9-ii, 10ii, 11ii, 12ii, 13ii, 14ii, 15ii and 16ii.

The HBF do not comment on the merits or otherwise of individual sites therefore our representation is submitted without prejudice to any comments made by other parties on specific sites to be included in the Councils HLS. When allocating sites the Councils should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. The Council should also refer to the recently published Housing White Paper which emphasises the importance of a wide range of sites because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

Question 17-i.

Any proposed revisions to Policy HOUS1 concerning site thresholds for the provision of affordable housing should be in accordance with the Written Ministerial Statement dated 28 November 2014. Any proposed revisions should be viability tested in accordance with the NPPF (paras 174 & 175).

Questions 17-ii & 17-iii.

The priorities for the provision of different types of affordable housing should be based on evidence of need for each different type. The Councils should also consider the Government's proposals for Starter Homes as set out in the Housing White Paper whereby the Councils may deliver Starter Homes as part of a mixed package of affordable housing alongside other affordable home ownership and rented tenures determining the appropriate level of provision for the locality in agreement with developers.

Question 17-iv.

Policy HOUS2 should allow market homes to cross-subsidise the provision of affordable housing on exception sites.

Question 18-i.

The HBF is supportive of self-build for its additionality to housing supply. The HBF is supportive of a mixture of the current policy approach, land allocation on Council owned sites and exception sites. The HBF is less supportive of a housing mix approach whereby a requirement to provide self-build plots is imposed on sites. Such a policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. If these self-build plots are not developed then the Councils have effectively caused an unnecessary delay to the delivery of these homes. The Councils should also give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build programme, etc.) of implementing any such housing mix policy approach. The Council should refer to the East Devon Inspector's Final Report dated January 2016 which expresses reservations about the implementation difficulties associated with this sort of policy. In para 46 the Inspector states "*However, I don't see how the planning system can make developers sell land to potential rivals (and at a reasonable price)*". If the Councils wish to promote custom build it should be done on the basis of evidence of such need identified in its SHMA work (NPPG ID 2a-021-20140306) whereby the Councils should collate from reliable local information the local demand for people wishing to build their own homes. Any proposed self build policy should also be viability tested. The NPPG confirms that "*different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments*" (ID 10-009-20140306).

Questions 23-ii & 23-iv.

The Written Ministerial Statement dated 25th March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*". If the Councils wish to adopt the higher optional standards for accessible & adaptable homes the Councils should only do so by applying the criteria set out in the NPPG. It is incumbent on the Councils to provide a local assessment evidencing the specific case for West Dorset, Weymouth & Portland which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. A requirement for a proportion of new houses to be suitable for wheelchair users should only be included within the Local Plan for dwellings over which the Councils have nomination rights as set out in the NPPG (ID: 56-009-20150327).

Question 23-vi.

The Written Ministerial Statement dated 25th March 2015 confirms that "*the optional new national technical standards should only be required through any*

new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". So if the Councils wish to adopt the nationally described space standard the Councils should only do so by applying the criteria set out in the NPPG. The NPPG sets out that *"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing"* (ID: 56-020-20150327) :-

- Need - it is incumbent on the Councils to provide a local assessment evidencing the specific case for West Dorset, Weymouth & Portland which justifies the inclusion of the nationally described space standard in Local Plan policy. If it had been the Government's intention that generic statements justified adoption of the nationally described space standards then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The nationally described space standards should only be introduced on a "need to have" rather than a "nice to have" basis. The identification of a need for the nationally described space standard must be more than simply stating that in some cases the standard has not been met it should identify the harm caused or may be caused in the future ;
- Viability - the impact on viability should be considered in particular an assessment of the cumulative impact of policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Councils cannot simply expect home buyers to absorb extra costs in a joint Local Plan area where there exists severe affordability pressures. There is also an impact of larger dwellings on land supply. The requirement for the nationally described space standard would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. Alternatively it may undermine delivery of affordable housing at the same time as pushing additional families into affordable housing need because they can no longer afford to buy a nationally described space standard compliant home. The Councils should undertake an assessment of these impacts ;
- Timing - the Councils should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of starter home / first time buyer products may translate into reduced or slower delivery rates. As a consequence the Councils should put forward proposals for transitional

arrangements. The land deals underpinning the majority of identified sites will have been secured prior to any proposed introduction of nationally described space standards. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The nationally described space standards should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the nationally described space standards.

Question 23-vii.

There is no evidence to support the inclusion of the enhanced water efficiency standard within the Local Plan. The Written Ministerial Statement dated 25th March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Councils wish to adopt the higher optional standard for water efficiency the Councils should only do so by applying the criteria set out in the NPPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The NPPG (ID 56-013-20150327 to 56-017-20150327) refers to *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”*.

Conclusion

It is hoped that these representations will be helpful in informing the next stages of the West Dorset, Weymouth & Portland Joint Local Plan Review. If any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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