



Planning Policy (North Dorset)
South Walks House
South Walks Road
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SENT BY E-MAIL ONLY

22nd January 2018

Dear Sir / Madam

NORTH DORSET 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 comments in response to specific questions in the Council's consultation document.

Q1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset?

It is appropriate for the Council to use the figure of 366 dwellings per annum based on the Government's proposed standard methodology. However this methodology excludes any adjustments to support economic growth. It is noted that the Eastern Dorset SHMA Report 2015 included an uplift of +105 dwellings per annum for economic growth. The Council should give this further consideration along with any implications from the Western Dorset Economic Growth Strategy 2017.

The figure of 366 dwellings per annum is also for North Dorset only. It is noted that the Government's standard methodology estimated the OAHN for the Eastern Dorset HMA as 3,203 dwellings (uncapped) or 2,766 dwellings (capped) which is significantly higher than the previously calculated OAHN set out in the Eastern Dorset SHMA. These higher figures include significant increases in both Bournemouth and Poole as a consequence there may be

implications of unmet needs in the HMA which the Council will have to consider under the Duty to Co-operate which should be set out in a Statement of Common Ground.

If the Council's OAHN figure changes from the proposed 366 dwellings per annum then the HBF reserve the right to submit further comments during later stages of consultation.

Q4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

The current spatial strategy for North Dorset is set out in Policy 2 of the adopted Local Plan which identifies Blandford (Forum and St Mary), Gillingham, Shaftesbury and Sturminster Newton as main towns where the vast majority of housing growth will occur. Stalbridge and eighteen other larger villages are identified as the focus for growth to meet local needs outside of the four main towns. Beyond the defined boundaries of these towns and villages, the remainder of the District is subject to countryside policies where development will be strictly controlled.

During the Local Plan Review the Council should re-consider if the existing strategy is the most appropriate to meet the higher proposed housing requirement. It is also appropriate to re-consider Stalbridge's position within the existing hierarchy as the fifth largest settlement its potential to accommodate more of the District's future development needs should be reviewed.

Q5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

The existing settlement hierarchy should be re-considered in the Local Plan Review (see answer to Q4 above). It is also appropriate to re-consider defined settlement boundaries which should not be drawn too tightly. The use of settlement boundaries to arbitrarily restrict sustainable development from coming forward on the edge of settlements is not a positive approach. A more flexible approach to development in the rural area may be necessary given the higher proposed housing requirement. It is important that the Plan's proposed housing distribution recognises the difficulties facing rural communities including lack of housing supply and unaffordability. The NPPG emphasises that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the core planning principles of the NPPF (para 17) is to *"take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it"*. This principle is re-emphasised in para 55 which states *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities"*. The Council should re-consider

its approach to permitting sustainable development that is well related to and not just within settlement boundaries.

The Council's Housing Land Supply (HLS) over the plan period should not be planned to a minimum with no flexibility to respond to changing circumstances. Therefore within the overall HLS sufficient headroom should be provided. The Council should also provide a broad portfolio of housing sites in order to maximise housing delivery because a wide variety of sites by size, location and market type provides house builders of all types with access to suitable land in order to offer the widest possible range of products. This approach is also promoted in the Housing White Paper 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.

Q22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

The reference to nine dwellings in Policy 9 should be removed to allow larger sites to come forward.

Q23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

The existing policy approach should be amended to allow exception sites adjacent to the four main towns to come forward.

Q24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

On rural exception sites the Council should continue with its existing policy approach to allow market homes which cross subsidise affordable housing.

Q25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options?

- a. Allowing serviced plots to come forward under the current development plan policies.
- b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing.
- c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site.
- d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties).
- e. Identifying land in public ownership which would be sold only for self-build development.

f. The use of Local Development Orders to facilitate self-build development.

If the Council wishes to promote self-build it should do so on the basis of evidence of such need. It is not evident that the Council has assessed such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) whereby the Council should collate from reliable local information the local demand for people wishing to build their own homes.

The HBF supports self-build in principle for its potential contribution to overall housing supply. The Council's approach to self-build should be positively undertaken to increase the total amount of new housing developed via Options a, b, d, e and f.

The HBF is not supportive of Option c which 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 plots are not developed by self-builders and there is no reversion mechanism by which these dwellings may be developed by non self-builders then these undeveloped dwellings should be excluded from the Council's future Housing Land Supply. The Council should also give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build programme, etc.) of implementing Option c as well as assessing any viability impacts. 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).

Conclusions

For the North Dorset Local Plan Review to be found sound under the four tests of soundness as defined in the NPPF, the Local Plan must be positively prepared, justified, effective and compliant with national policy. It is hoped that these responses are of assistance to the Council in informing the next stages of its Local Plan Review. In the meantime if any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTPI
Planning Manager – Local Plans