

North Dorset District Council, (3008), Matter 4/7: Bournemouth and Poole HMA Sub-regional Strategy

E1 Executive Summary

- E1.1 This submission by North Dorset District Council (NDDC) addresses two of the matters for discussion raised in relation to the sub-regional strategy for the Bournemouth and Poole Housing Market Area (HMA), namely Matters 4/7 a) and 4/7d).
- E1.2 The relationship between Bournemouth and Poole and the rest of the HMA is not sufficiently clear. The sub-regional strategy focuses too much on the South East Dorset conurbation and does not recognise the needs of the market towns in the more rural parts of the HMA or consider the possible contribution such towns could make to achieving sustainable patterns of development.
- E1.3 The RSS's requirement for 255 net dwellings per annum (dpa) for North Dorset during the period 2006 – 2026 is too low to support viable communities in rural areas. In response to the draft RSS the Council expressed the view that the figure of 220 net dpa for the post-2016 period should be increased to somewhere in the range of 250-290 net dpa. In the light of the recent advice from the 4(4) authorities in Dorset, the Council would support an increase to about 310 net dpa, both for the first 10 years of the RSS and post-2016 to reflect Scenario 1 considered in the advice (the pro-rata scenario).
- E1.4 The potential option of significant expansion at Gillingham in the mid- to long-term is discussed in the Council's (respondent ref: 421) submission on the matters relating to the South Somerset HMA sub-regional strategy (Matter 4/13).
- E1.5 Although the Bournemouth and Poole conurbation is highly constrained by internationally important nature conservation sites, the market towns in the periphery of the HMA are not. These towns have their own needs, which could be met by a higher level of development than currently proposed in the draft RSS and this growth could be accommodated without having an adverse impact on internationally important nature conservation sites.

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1 Scope of Submission

- 1.1 This submission by North Dorset District Council (NDDC) addresses two of the matters for discussion raised in relation to the sub-regional strategy for the Bournemouth and Poole HMA.
- 1.2 *“In setting out policies and proposals for the HMA sub-region, does the draft RSS adequately deal with the following questions:*
- a) *Is the draft RSS sufficiently clear about the spatial outcomes it is seeking in Bournemouth and Poole in terms of their present and future regional and sub-regional roles and their relationship with the other parts of the HMA? ...*
 - d) *Have environmental limits arising from matters such as flood risk and the protection of environmental assets been adequately taken into account and in particular do the proposals reflect the need to avoid any impact on the integrity of the important nature conservation areas around the conurbation?”*

2 Main Point – Matter 4/7 a)

- 2.1 The relationship between Bournemouth and Poole and the rest of the Housing Market Area (HMA), as defined in the draft RSS, is not sufficiently clear. The sub-regional strategy for the South East of the Region focuses too much on the South East Dorset conurbation. It does not recognise the needs of the market towns in the more rural parts of the HMA or consider the possible contribution such towns could make to achieving sustainable patterns of development.
- 2.2 NDDC’s view is that the annual average dwelling requirement of 255 net dwellings per annum (dpa) for the period 2006 – 2026 is too low to support viable communities in rural areas. In response to the draft RSS the Council expressed the view that the figure of 220 net dpa for the post-2016 period should be increased to somewhere in the range of 250-290 net dpa. In the light of the recent advice from the 4(4) authorities in Dorset¹, the Council would support an increase to about 310 net dpa, both for the first 10 years of the RSS and post-2016 to reflect Scenario 1 considered in the advice (the pro-rata scenario).²
- 2.3 The potential option of significant expansion at Gillingham in the mid-to long-term is discussed in the Council’s (respondent ref: 421) submission on the matters relating to the South Somerset HMA sub-regional strategy (Matter 4/13).

¹ Implications of the 2003 Revised Household Projections – Section 4(4) advice – Bournemouth Borough Council, Borough of Poole and Dorset County Council (December 2006)

² As recommended in Agenda Item 6, North Dorset District Council Cabinet (1st March 2006), which considered the Section 4(4) Authorities advice

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3 Main Point – Matter 4/7 d)

- 3.1 Although the Bournemouth and Poole conurbation is highly constrained by the need to protect internationally important nature conservation sites, the market towns in the periphery of the HMA are not so constrained. These towns have their own needs, which could be met by a higher level of development than currently proposed in the draft RSS and in the Council's view, this growth could be accommodated in a way, which would not have an adverse impact on internationally important nature conservation sites.

4 Matter 4/7 a)

Introduction

- 4.1 The Council's view is that the level of growth proposed in the Region's rural areas (i.e. 8,000 net dpa) is too low to support viable communities. This argument was the subject of the "Sustainability Drive Hurts Rural Housing" article in Planning Magazine on 1st September 2006 (see Appendix A). The main concerns are that the RSS strategy is too "urban-focused" and the needs of rural areas have not been properly looked at. The Council is particularly concerned that low levels of development in rural areas will make it difficult to maintain economic growth and deliver affordable housing.

Draft RSS Policies and the Implications for North Dorset

- 4.2 Section 4.3 of the draft RSS deals with the South East of the Region, but concentrates almost exclusively on the South East Dorset Conurbation. The only reference to the market towns in the HMA is in paragraph 4.3.1, which states "*the role of other key centres such as Dorchester, Weymouth and Salisbury and locally important market towns needs to be maintained through balanced development, without increasing the need to travel for jobs and services.*"
- 4.3 There are no Strategically Significant Cities or Towns (SSCTs) in North Dorset, but there are three settlements likely to be defined as "Development Policy B Towns" in LDDs, namely:
- Blandford;
 - Gillingham; and
 - Shaftesbury.³
- 4.4 Whilst Development Policy B of the draft RSS provides some limited guidance on how the role of these "*locally important market towns*" will be maintained, the level of housing growth assigned to the District is considered too low to enable these towns to maintain their role,

³ The SWRA were party to a Statement of Common Ground at a recent Call-in inquiry in North Dorset where it was agreed that the smallest of the three towns (Shaftesbury) was a Development Policy B Settlement (Land East of Shaftesbury Call-in Inquiry – Statement of Common Ground No.2). It is therefore highly likely that the larger two towns would also merit this status.

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particularly in the period post-2016. This low level of growth has potentially adverse implications both for the economy and the provision of affordable housing.

- 4.5 For North Dorset, the average annual dwelling requirement in the draft RSS is 255 net dpa. During the period 2006 – 2016 the RSS envisages that completions should run at about 290 net dpa, falling to 220 net dpa post-2016. This represents a considerable reduction in the District housing provision figure in the Structure Plan of 335 net dpa. Also it should be noted that historic completions in North Dorset since 1994 have averaged 443 net dpa. 290 net dpa represents a 13% reduction on the current Structure Plan figure and a 34% reduction on the current rate of completions. 220 net dpa represents a 34% reduction on the current Structure Plan figure and a 50% reduction on the historic rate of completions.
- 4.6 The RSS identifies a need to concentrate housing development in the main cities and towns of the region, where the bulk of new jobs will be created over the next 20 years. The RSS also considers it necessary to more strictly control development in rural areas as part of this overall approach. Whilst it is accepted that a broad approach of this nature is likely to deliver more sustainable patterns of development, it is open to question where the balance between urban and rural areas should lie. There is a concern that the housing provision figures rely too heavily on simplistic sub-regional economic modelling without properly considering the needs of market towns and their rural hinterlands.

Implications for the Economy

- 4.7 North Dorset currently has an unemployment rate of 0.7% and is consistently one of the Districts with the lowest level of unemployment in the Region. Although levels of housing development have exceeded Structure Plan requirements, this has not been without a similar level of employment development. This has ensured that there is a choice of employment opportunities for local people and that there has been an adequate source of labour supply for local businesses.
- 4.8 Population projections already predict that the proportion of North Dorset's population of working age will diminish in the coming years as a result of an ageing population. This situation will be worsened by the low levels of housing proposed in the draft RSS, particularly in the period post-2016, and potentially the economic well-being of North Dorset will be threatened.
- 4.9 On average 443 net dpa were delivered each year in the District in the 12 years from 1994 to 2006. However, in just 10 years it is proposed that the average annual rate of housing development would be reduced by 50% (i.e. to 220 net dpa after 2016). This low level of house building is likely to be a permanent fixture, in the light of paragraph 4.5.7 of draft RSS (page 102), which recognises that in some rural districts allowance has been made in the period up to 2016 for

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committed development and states that “*provision during the second period (i.e. 2016 – 2026) more closely accords with the strategy*”.

- 4.10 Any business looking to stay in North Dorset over the next 20 years is likely to find it very difficult to expand due to the likely shortage of labour supply. Firms may consider that they need to relocate from what are at present relatively self-contained market towns to the SSCTs of the region. This is likely to result in fewer job opportunities in the rural areas and will lead to increased out-commuting and / or local people leaving the area to find work. It is considered that a higher level of housing development is needed in North Dorset in order to support the local economy.

Implications for the Provision of Affordable Housing

- 4.11 A reduction in the level of housing development in North Dorset will make it much more difficult to provide sufficient affordable housing in the District. Table 2 on page 37 of the adopted North Dorset Local Plan⁴ sets a target for the provision of 90 affordable dwellings each year between 1998 and 2011. This represents 26% of the 347 dpa (gross) required by Policy 2.3 of the Local Plan. Historically the Council has provided 83 affordable dpa against a higher overall level of housing development (456 dpa gross), representing 18% of the total.
- 4.12 If the average annual requirement is reduced to 290 net dpa (as proposed for the period 2006 – 2016), the Council would have to deliver 30% of all housing as affordable in order to provide 90 affordable dpa. However, if the average annual requirement is further reduced to 220 net dpa (as is proposed for the period after 2016), the percentage of affordable needed to deliver 90 dwellings rises to 40%.
- 4.13 It is considered highly unlikely that the Council would be able to deliver significantly more than 40% of all housing across the District as affordable (based on current policies and funding mechanisms) because of viability issues. The post-2016 figure of 220 net dpa would therefore make it extremely difficult for the Council to deliver more than 90 affordable dpa.
- 4.14 The proposed reduction to 220 net dpa for North Dorset post-2016 would also have serious implications because at that level of provision, very little greenfield land would be required for housing development. Since 1994 completions on non-allocated sites within the towns of Blandford, Gillingham, Shaftesbury and Sturminster Newton have run at about 100 gross dpa, with completions in the villages and the countryside combined running at about 140 gross dpa.
- 4.15 Even if rates of development in the villages and countryside of North Dorset were significantly reduced, 220 net dpa would still provide only limited scope for greenfield development. The Council is more likely to

⁴ North Dorset District-Wide Local Plan (1st Revision), North Dorset District Council, January 2003

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secure a higher proportion of affordable housing on greenfield sites, because of their size and generally lower implementation costs. Many brownfield sites fall below the size threshold above which affordable housing can be sought and even on larger sites other costs associated with brownfield redevelopment may make high levels of affordable housing provision unviable.

- 4.16 The 90 affordable dpa target in the Local Plan was based on the needs identified in the Council's 1998 Housing Needs Survey. Since then the need for affordable housing has increased significantly due to a worsening house price to income ratio in North Dorset, as set out in the table below, taken from the Council's 2006 Annual Monitoring Report.⁵

House Price Income Ratio 2000 to 2005 In North Dorset	
Year	Ratio
2000	7.4
2001	8.2
2002	9.3
2003	9.9
2004	11.4
2005	11.4

- 4.17 An annualised housing provision figure in the range 250 – 290 net dpa for the period post-2016 would offer some scope for the Council to improve performance with regard to affordable housing provision, whilst also reducing the overall level of housing development in line with the regional strategy. In this range between 100 and 116 affordable units could be provided per annum, if 40% of all housing was delivered as affordable. An increase to 310 net dpa, to reflect the pro-rata scenario (Scenario 1) in the recent advice of the 4(4) Authorities in Dorset, would deliver 124 affordable dpa.

The Regional Shortfall in Housing Provision

- 4.18 The RSS recognises that about 25,000 dpa are required across the region as a whole to meet housing needs. However, provision is only made for about 23,000 dpa, leaving a shortfall of about 2,000 dpa. The Regional Assembly has argued that the shortfall can be justified because of the unacceptable environmental consequences of higher levels of housing growth, particularly in the main cities and towns. However, some redistribution to the towns in Development Policy B might be an acceptable alternative approach.
- 4.19 The Council considers that the shortfall in housing provision (i.e. the difference between the identified need for 25,000 dpa and the level of provision in the RSS of 23,000 dpa) could be assigned to the market towns of the region. In the context of North Dorset, it is considered that

⁵ Annual Monitoring Report 2006, North Dorset District Council, December 2006

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a higher level of housing development (i.e. up to 310 dpa) could be accommodated within environmental constraints and would benefit the economies of the market towns of Blandford, Gillingham and Shaftesbury and their rural hinterlands.

5 Matter 4/7 d)

Introduction

- 5.1 Although the Bournemouth and Poole conurbation is highly constrained by the need to protect internationally important nature conservation sites, North Dorset and in particular the market towns in the District, are not so constrained. North Dorset lies outside the South East Dorset 'heathland zone' and those internationally important nature conservation sites that do occur in the District are sufficiently far away from the main towns for development not to have a significant adverse effect on them.

Draft Screening Opinion Document

- 5.2 The European Commission has produced advice on how to undertake an appropriate assessment of plans and projects that could potentially affect Natura 2000 sites.⁶ NDDC has produced a draft screening opinion document (see Appendix B) in accordance with the guidance. The Council has sought a screening opinion from Natural England on the appropriate assessment of its forthcoming Local Development Documents (LDD), as set out in the Council's revised Local Development Scheme (LDS).⁷ At the time of writing (mid-March 2007) Natural England's responses to the consultation were awaited.
- 5.3 The conclusions of the draft screening assessment are that *"there are not likely to be any significant effects on the European Sites as a result of the land-use plans listed above (i.e. the LDDs identified in the Council's revised LDS). Therefore, there is no requirement for Appropriate Assessment to be carried out on any of the land-use / spatial plans that the Council has set out to produce and adopt."*
- 5.4 It is hoped that by the time Matter 4/7 is discussed at the EiP, that Natural England will have responded to the consultation and that a finalised screening opinion will be available.

Conclusion

- 5.5 The Council's conclusion is that a higher level of housing growth could be accommodated in the market towns of North Dorset without any adverse impacts on internationally important nature conservation sites within the HMA, particularly those in close proximity to the Bournemouth and Poole conurbation.

⁶ Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC – European Commission (November 2001)

⁷ North Dorset District Council has revised its Local Development Scheme (LDS), following consultation with the Government Office for the South West. The revised LDS came into effect on 1st March 2007