

Bournemouth and Poole Housing Market Area
Strategic Housing Land Availability Assessment

Comments received on the methodology

Monday 28 January 2008

1. Background

- 1.1 As part of the SHLAA, a methodology was developed by the officer group based largely on the DCLG guidance¹. This methodology was discussed at the inception meeting of the panel on 6 December, 2007. At the time of the publication of the SHLAA return forms the methodology was published and comments welcomed. As at the time of preparing this report, three comments had been received. These comments are summarised below.

2. Comments received on the methodology

Campaign to Protect Rural England – Dorset Branch (CPRE)

- 2.1 The CPRE are generally in agreement with the methodology. It is acknowledged that some changes to the document were made by the panel at the meeting in December and the CPRE support those changes. The stage where the CPRE would like to see the most significant change is the assessment matrix. Changes to other stages are suggested also.
- 2.2 Dealing with the suggested changes to the assessment matrix, the CPRE is concerned that 'the integrity of the SHLAA process must be above criticism to satisfy the public, environmental groups, developers and the Government'. Therefore it would like to see some parameters listed in more detail and others qualified to give it greater clarity and integrity.

Comments on suitability

Location within a settlement: the CPRE is concerned that the methodology does not refer to 'avoid the coalescence of settlements' from the CLG guidance. The Callcutt review report² is cited regarding the avoidance of urban sprawl, although that report does state 'edge-of-town development will be needed if the target is to be met'.

Accessibility by foot to local services: the CPRE raises the concern that school places and GP provision should be in place to meet demands from residents of the new dwellings. While the achievement of this would be expected, the planning authority is not in a position to guarantee that places will be available. Sadly the planning authority cannot guarantee that parents will send their children to the local school or that they will allow those children to walk or cycle.

Accessibility by foot to local services: all distances will be measured using footways and footpaths rather than as a straight line.

¹ Strategic Housing Land Availability Assessments – Practice Guidance, CLG, July 2007

² The Callcutt Review of Housing Delivery, CLG, November 2007

Accessibility to public transport services and also accessibility to higher level services by public transport: the CPRE considers that a one-hourly bus service will penalise and exclude some sectors of the community. While this is accepted, even for large parts of the conurbation, a one hourly service is the norm and it is only on the major radial routes that services are more frequent. The journey is to an employment site, which is a site where the uses fall within classes B1 to B8. At least 50% of employment is not on these sites, for example the jobs in the tourism industry, in retailing, and in education. While residential travel plans may be appropriate for the larger developments, it must be remembered that within the urban areas, the majority of sites are likely to be small, that is between one and four dwellings. For example, in Bournemouth for sites completed in the year 2006/07, 61% were between one and four dwellings. Only five sites were greater than fourteen dwellings³. It is agreed that reducing the need to travel is a key objective; it is beyond the remit of the local planning authorities to determine where people live and work. The CPRE refer to 'demand management' and the problems associated with reduced car parking areas.

Physical problems or limitations

The CPRE suggest adding simple criteria to assess the quality of the access, including type, junctions and gradient, between the new and existing residential areas.

Environmental conditions

The CPRE consider two aspects of this. First the impact of the development on climate change and second the effect the new development will have on prospective residents.

Achievability

Prospects of funding or investment to address identified constraints or assist developments: the CPRE consider the affects of surface water run-off from the development should be considered. The organisation recognises the concerns raised by many over the last couple of years of the effects of converting front gardens in to hard standings.

Other comments

The other main area of concern is the villages listed where exception sites would be acceptable but which do not have any services. Ten settlements in East Dorset district are listed. East Dorset District Council will assess all sites submitted within or adjacent to those settlements listed in the current development plan, required in part by the higher than anticipated strategic housing requirement for the District, as set out in the draft South West Regional Spatial Strategy.

³ Bournemouth Local Development Framework, Annual Monitoring Report, 2006/07, Bournemouth Borough Council, December 2007

Joseph Pestell (formerly Shaftesbury Town Council Member, Planning & Highways Committee)

- 2.3 Mr Pestell expressed concern that most of North Dorset was to be excluded from the Assessment. He commented that 'there is a demonstrable need for more housing in the Shaftesbury and Gillingham areas as shown by affordability ratios being amongst the highest in the UK (after certain London boroughs and parts of Cornwall). Other studies have shown that Shaftesbury alone needs at least 20 affordable homes to be constructed each year to maintain a sustainable population'. He commented that 'the recently authorised (despite obstruction from GOSW) 750 home scheme at Shaftesbury will only meet the needs for the years during which it is constructed. The shortfall that has built up over recent years (an average of 1 dwelling per year built = 19 dwellings shortfall)'.
- 2.4 A reply to Mr Pestell was sent that most of the district had not been excluded from the assessment which he acknowledged with an apology. He had not realised there was a second page of settlements on the North Dorset District Council SHLAA webpages.
- 2.3 Mr Pestell commented that the preamble refers to the Government guidance and a slightly differing methodology has been adopted. He considered that 'significant parts of the Government guidance have been completely ignored, to such an extent as to render the whole exercise virtually meaningless and a complete waste of the taxpayers' money'. Mr Pestell commented that the methodology is seeking 'to reinforce the position of the inadequate Regional Spatial Strategy rather than to provide land for housing in accordance with the needs found by the Barker report'.
- 2.4 Mr Pestell's response contains, very briefly, the passages from the Government guidance that he feels are at variance with the local planning authorities' position. He hopes that we 'will consider these anew and amend our researches accordingly. Failure to do so could bring the Councils concerned into disrepute or even lead to court actions against them'.
- 2.5 Mr Pestell's detailed comments are as follows (note the page numbers refer to the Government guidance):
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| Page 7 | it should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. |
| Page 15 | the use of this standard methodology is strongly recommended because it will ensure that the Assessment findings are robust and transparently prepared...However, where a different methodology is used, the Assessment report will need to explain the approach chosen and the reasons for doing so, and the approach may need to be justified at independent examination. |
| Page 16 | the Assessment is significantly different from an Urban Capacity Study...identify additional sites with potential for housing...such as sites in rural settlements, brownfield sites outside settlement boundaries and suitable greenfield sites...assess the deliverability/developability of all sites. |
| Page 21 | the scope of the Assessment should not be narrowed down by existing policies designed to constrain development. |

Page 25 assessments will need to be more comprehensive and intensive... where housing market conditions signal worsening affordability, reflecting the need to identify more sites for housing.

- 2.6 With regard to the detailed comments on the methodology, the assessment is seeking to identify as many sites as possible within the study area. Although the number of sites put forward by interested parties is limited, the local planning authorities are expecting to introduce other sites as part of the assessment (stages 2 to 4). While the use of a standard methodology is accepted, it is considered that in some areas of the guidance, additional advice is needed for the assessment to be undertaken consistently within the six local planning authority areas, for example whether to adopt a minimum site size (stage 4) or what types of land are to be excluded from the assessment (table 2). With regard to the third point, it is expected that the assessment will identify a range of sites in varying types of location and assess their deliverability and developability (stage 7). In terms of narrowing the scope of the assessment, only sites which are within nationally protected areas, such as SSSIs, and those outside or unrelated to settlements are excluded from the exercise. Other sites will be assessed against the assessment matrix. Mr Pestell's final comment will depend on the number of sites which are identified by the local planning authorities and by interested parties and whether those sites meet the needs of the communities following their assessment against the criteria in the matrix and the tests of suitability, availability and achievability.

West Parley Action Group (Mr R Heaslip, Chairman)

- 2.7 The West Parley Action Group is concerned that there is no formal consultation, including a response form or procedure. The SHLAA document presented to East Dorset District Council's Policy and Resources Committee (P&R) on 5 December was entitled a "Draft Brief" and a "Consultation Draft" which implies 'that there will be a set procedure for consultation; that key stakeholders and the general public will be informed of this; that there will be an email address and a date for submissions; that inputs will receive some formal consideration; and that there will be a final document which will embody the results of this consultation'.
- 2.8 The action group commented that 'councillors at the P & R committee recognised that when the results of the SHLAA were made public (as they would have to be) they were bound to attract major public attention and debate. It is thus necessary for all parties - the Council, key stakeholders and the public - to have confidence in the robustness and integrity of the SHLAA process'.
- 2.9 On a specific point, the action group commented that the Figure 2 of the guidance Para 14 of the Ministry's Practice Guidance 'specifically includes local communities in the list of key stakeholders involved in the survey and assessment'. It is the group's view that 'Appendix A list of key stakeholders does not meet this requirement (a point that was also brought up by Councillors at the 5 December P & R Committee meeting). This surely needs immediate rectification in order to reflect the Government guidance'.
- 2.9 In response, the consultation for the SHLAA is not a statutory requirement. It is being undertaken to try and enhance the process, by giving people the opportunity to make comment on the brief. In total over several thousand organisations and individuals have been written to inviting comment and also

the submission of sites for assessment. However, the brief follows national guidance and it is therefore considered unlikely that there would be great scope for change. The most important aspect of the work is the assessment of the sites. These will be subject to Council approval and will form part of the evidence for the Local Development Framework and therefore subject to comment and/or criticism. The panel has been chosen to try and represent the wide range of interests. Representing local communities are Dorset Community Action and CPRE.

3. Conclusion and recommendation

- 3.1 The panel are invited to consider the comments discussed above and suggest any further changes to the methodology. It should be remembered that the assessment matrix is there to enable the individual local planning authorities, overseen by the panel, to filter the sites. It is extremely unlikely that every site will meet all the criteria and the sites included in the 5 and 15 land supply schedules will be those which meet the majority of the criteria.