

**NORTH DORSET LOCAL PLAN 2011 – 2026 PART 1**

**EXAMINATION**

**Inspector's requests and points arising during hearing sessions**

**Issue 1: Duty to Co-operate, Legal Requirements and the Council's Broad Strategy**

**Note on:**

- **Extending the Plan Period;**
- **The Need for Early Review of the Local Plan Part 1; and**
- **The relationship of Local Plan Part 1 with the Local Plan Part 2.**

**May 2015**

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# 1. Recommendations

1.1 The recommendations that are made as a result of this note are:

- That the plan period be extended to cover the period from 2011 to 2031;
- That the annualised housing target be increased from 280 dwellings per annum to 285 dwellings per annum to take account of a second homes allowance;
- That the overall housing supply target for the Local Plan be for the provision of 5,700 dwellings by 2031;
- That no further allocation of employment land is needed to meet the projected growth in demand; and
- The Council proceeds to the adoption of Local Plan Part 1 based on the current evidence to enable a significant boost to housing supply with a provision for an early plan review to incorporate new emerging evidence, joint working arrangements and ongoing engagement under the Duty to Cooperate.

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## 2. Introduction

- 2.1 National policy (NPPF paragraph 157) requires local plans to 'be drawn up over an appropriate time scale, preferably a 15-year time horizon'. At the examination hearings, the Council argued that the 15-year time horizon is a 'preference' rather than a requirement of national policy. The Council also argued that the Local Plan Part 1 (LP1) is consistent with paragraph 157 of the NPPF, as it is drawn up over a 15-year period (i.e. 2011 to 2026).
- 2.2 At the hearing sessions, the Inspector expressed concerns about this approach, suggesting that the phrase 'time horizon' indicated that local plans should look forward from the current time to last for 15 years. Reference was also made to paragraph 47 of the NPPF and to the need to 'identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15'. There was a concern that an end date of 2026 would not enable such provision to be made, especially in view of the two-part approach to North Dorset's Local Plan.
- 2.3 The issue of the Plan period had been raised by a number of respondents and, whilst a variety of views were expressed on what a revised end date should be, the most commonly suggested date was 2031. The Inspector suggested that the Council should consider extending the Plan period, ideally to 2031. There was no suggestion that the start date of 2011, which follows on directly from the end date of the currently adopted 2003 Local Plan, should be changed.
- 2.4 Extending the Plan period would require LP1 to make provision for additional development over any extended period. The Inspector asked the Council to consider what changes to policy might be required to accommodate the additional growth associated with extending the plan period.
- 2.5 The Council's assessment of the need for housing comes from the 2012 SHMA Update (MHN005), which covers the Bournemouth / Poole Housing Market Area (including the whole of North Dorset) and, on the basis of the 2008-based CLG household projections (rebased to 2011 using Council Tax records), assesses need in the period up to 2031.
- 2.6 On 27<sup>th</sup> February 2015, the Inspector requested (as Inspector's Question 5) that the Council produce a note on the newly released 2012-based CLG household projections. The response to this question (INS013) is available in the Council's examination library. It concluded that the 2012-based household projections suggested a household growth rate below that proposed in the 2012 SHMA Update (MHN005) and therefore there would be no implications for the adoption of the Local Plan in its current form.

- 2.7 The Council's assessment of the need for jobs and employment land comes from the Workspace Strategy 2012 Update (SED005), which covers Dorset (including the whole of North Dorset) and also assesses need in the period up to 2031.
- 2.8 The two studies outlined above provide the evidence of need for housing, jobs and employment land that could be used to extend the plan period to 2031.
- 2.9 The Inspector also asked the Council to comment on the need for an early review of LP1 and its relationship with the Local Plan Part 2 (LP2).

### 3. Housing Provision to 2031

- 3.1 Paragraph 5.10 of the summary report for North Dorset, which forms part of the 2012 SHMA Update states that 'trend-based data suggests household growth of around 273 per annum for the period 2011 to 2031 and so a housing delivery figure (on the basis of this figure) might be around 280 per annum (to take account of a small vacancy rate)'.
- 3.2 Paragraph 5.14 of the submitted LP1 states '280 dwellings per annum equates to a need for about 4,200 homes over the fifteen years from 2011 to 2026 and this has been used as the basis for the District-wide housing provision figure of 4,350 in the Local Plan Part 1'.
- 3.3 In the event that the Plan period was extended to 2031, the identified need for housing, based on the 2012 SHMA Update, would increase from 4,200 to 5,600.

#### Second Homes Allowance

- 3.4 At the hearing session on Issue 4: Meeting Housing Needs, the Home Builders' Federation raised the issue of whether an allowance should also be included in the figures for second homes (in addition to the allowance for the vacancy rate). This point had already been accepted during the examination of the Christchurch and East Dorset Local Plan (which used the same evidence base) and at the hearing session for LP1. The Council agreed that an allowance from this source should be included.
- 3.5 Council Tax data records from 2014 (at <https://www.dorsetforyou.com/399854>) show that in North Dorset, 482 of the 31,048 dwellings are second homes, which equates to 1.55%. Applying this percentage to the figure of 280 dwellings per annum (dpa) would add another 4.34 dpa. Rounding this figure up to 5 would give a revised annualised rate of 285 dpa. In the event that the Plan period was extended to 2031, the identified need for housing, based on the 2012 SHMA Update and adjusted to take account of second homes, would increase to 5,700.

#### Supply of housing

- 3.6 During the course of the hearing sessions, the Council provided more detailed information on their housing trajectory (MHD003). This took account of completions, permissions, greenfield sites proposed as broad locations for growth in LP1, infill potential and also included adjustments for windfall from various sources. MHD003 shows that 4,638 dwellings could be delivered by 2026 from all these sources, which exceeds the identified need for 4,200 dwellings.
- 3.7 MHD003 also shows that two sources of supply would continue to deliver post 2026. It is estimated that 642 of the 1,800 homes proposed as part of the Gillingham Southern Extension would be built after 2026. It is also anticipated that

there would continue to be a yield from windfall from various sources (of about 70 dwellings in total) post 2026. MHD003 showed that 5,350 dwellings could be delivered by 2031 from all of these sources against the increased identified need for 5,700 dwellings.

- 3.8 This analysis shows a shortfall of 350 dwellings against the increased identified need for 5,700 dwellings in the period up to 2031. This shortfall can be met (and exceeded) from two main sources of supply, which are:
- Adjustments to the assumed capacity of certain broad locations for growth already identified in LP1; and
  - Rural areas (i.e. outside the four main towns), where the Inspector has asked the Council to assess the need for growth and re-assess the policy approach to housing and employment in rural settlements.

### **Adjustments to the Capacity of Broad Locations for Growth**

- 3.9 During the hearing sessions, the Council's strategy for accommodating growth at each of the four main towns was discussed, as was the likely capacity of various different broad locations for growth. In the light of those discussions, it is considered that adjustments to the capacity of two broad locations should be made to increase the supply of housing. These are:
- St Mary's Hill, Blandford St Mary; and
  - Land south of Elm Close, Sturminster Newton.
- 3.10 The proposed adjustments to the assumed capacity of both of these broad locations are discussed below.

#### **St Mary's Hill, Blandford St Mary**

- 3.11 The land to the south-east of Blandford St Mary, situated to the south of the A350 / A354 junction on the Blandford Bypass (the 'St Mary's Hill' site) was submitted by the landowner as part of the SHLAA (2/03/0460) and has been assessed as being available and having potential for housing. This site was included in LP1 following consultation on the Focused Changes (SUD007) in August 2014, which also saw the deletion of the site at Crown Meadows, Blandford Forum.
- 3.12 The site submitted through the SHLAA comprises a single field extending to 12.2 hectares immediately adjacent to the Blandford Bypass. In the SHLAA, the site was assessed as having capacity for about 360 homes. However, in view of the need to retain a long term corridor for the Spetisbury / Charlton Marshall Bypass, it was considered that 300 homes would be a more realistic estimate of capacity, which has been assumed in LP1.
- 3.13 In response to consultation on the Focused Changes, Symonds and Sampson LLP (ID 3109) and Gladman Developments (ID 3074) both suggested that the site should be extended up to the trackway known as Ward's Drove, through the inclusion of an



additional field, which is about 6 hectares in size. An additional hearing statement was also produced by Peter Dutton of Gladman Developments relating to Issue 7: Blandford, making similar points in response to the questions asked by the Inspector.

- 3.14 The proposals for the St Mary's Hill site are accompanied by a number of technical studies, which were submitted as part of the examination by Malcolm Brown of Sibbett Gregory, representing Blandford St Mary Homes (ID 1596). Whilst the studies largely relate to the site originally proposed by Blandford St Mary Homes, some are directly relevant to the additional field and it is considered that there are no major constraints that would prevent this land from being brought forward for development. On that basis, it is considered that LP1 should assume a greater capacity for Site 5 – South east of Blandford St Mary, as shown on Figure 8.1: Blandford Inset Diagram of LP1. The Submission Document assumed a capacity of 300 dwellings. If it is also assumed that if the additional 6 hectare field, which would take development up to Ward's Drive, formed part of this broad location for growth, then the assumed capacity would increase by 150 units to 450 dwellings.

#### Land South of Elm Close, Sturminster Newton

- 3.15 The land south of Elm Close, Sturminster Newton (also known as land to the east of the former Creamery) was assessed as part of the SHLAA (2/54/0459). It is also identified as a broad location for growth in Criterion (h) of Policy 19: Sturminster Newton. The site is in the control of Taylor Wimpey, a major national house builder who confirms in its representation (Representation 769/4183-4197) that the site is *'available and deliverable now'*. The site promoter confirms that *'the site is in a single ownership, is relatively flat and well contained in the wider landscape'*.
- 3.16 The site extends to 1.2 hectares and is identified as contributing 35 dwellings to the five year housing land supply in the Annual Monitoring Report 2014. However, this estimate also takes account of Criterion (r) of Policy 19: Sturminster Newton, which indicates that additional allotments would be provided *'on land between Elm Close and the Trailway'*.
- 3.17 At the examination hearing session for Sturminster Newton, Tim Hoskinson of Savills (representing Taylor Wimpey) suggested that it was not necessary for the allotments to be provided on the narrow strip of land between Elm Close (to the north) and the Railway (to the south). He suggested as an alternative, that the allotments could be located further east beyond the eastern end of Elm Close on land which is also within his client's control.
- 3.18 Paragraph 7.140 of LP1 states that *'allotments and burial grounds at the four main towns should ideally be provided within settlement boundaries however, where no suitable site exists, a suitable site outside a settlement boundary may be considered'*.

- 3.19 At the examination hearing, the Council considered that the suggested alternative site for allotment provision would be an acceptable approach, as the allotments would be located immediately adjacent to the urban area of Sturminster Newton and would be an acceptable use in the countryside.
- 3.20 The site at Elm Close directly adjoins the former Creamery site, which has been developed at quite a high density. It would be appropriate to develop the site at Elm Close at a similar density and on that basis it is considered that the assumed density of the site in LP1 could be increased by 10 units to 45 dwellings.

### **Housing Need in Rural Areas**

- 3.21 The second source of supply to meet the shortfall of 350 dwellings against the increased identified need for 5,700 dwellings in the period up to 2031 is from the rural areas. The Inspector has asked the Council to assess the need for growth and re-assess the policy approach to housing and employment in rural settlements. These issues are discussed in more detail in MHD007. Two categories of additional supply have been identified. These are SHLAA sites in Stalbridge and the eighteen larger villages with identified settlement boundaries (totalling 96 dwellings); and from 'residual need' in the rural areas to be allocated through neighbourhood plans or Local Plan Part 2 (totalling at least 177 dwellings).

### **Meeting Housing Needs to 2031**

- 3.22 The discussion above demonstrates that additional provision in the rural area of North Dorset to meet identified rural needs coupled with the re-assessment of the assumed capacity of two broad locations for growth would ensure that LP1 would make sufficient provision of housing to meet the overall need for housing in the period up to 2031.
- 3.23 The provision outlined in MHD003 shows that 5,350 homes could be provided within the policy framework as set out in the Submitted LP1, leaving a shortfall of 350 dwellings which are required to meet the revised identified need of 5,700 dwellings in total (285 dpa) to 2031. A summary of how that shortfall would be met is set out in Figure 3.1, which shows that the further proposed changes to LP1 discussed in this note would provide more than sufficient housing to meet the identified need to 2031.

Figure 3.1 – Meeting Housing Needs to 2031

Meeting Housing Needs to 2031	
<b>Identified need for housing 2011 to 2031 (285 dpa)</b>	<b>5,700</b>
Housing supply already identified in MHD003	5,350
Shortfall (need – identified supply)	350
<b>Sources of additional supply</b>	
Additional assumed capacity at St Mary's Hill, Blandford St Mary	150
Additional assumed capacity at Elm Close, Sturminster Newton	10
SHLAA sites in Stalbridge / 18 village settlement boundaries	96
'Residual need' in rural areas to be allocated in LP2 / NPs (see MHD007)	177
<b>Total additional supply</b>	<b>433</b>
Total revised supply of housing in LP1 (5,350 plus 433)	5,783
Housing supply in excess of identified need (5,783 minus 5,700)	+83

## 4. Jobs and Employment Land to 2031

- 4.1 The Workspace Strategy 2012 Update (SED005) projected forward both the need for jobs and the need for employment land in the period up to 2031. Although LP1 only looks to 2026, the longer term needs for jobs and employment land are set out in the supporting text.

### The Need for Jobs to 2031

- 4.2 Paragraph 6.15 of LP1 states 'full time equivalent (FTE) employment growth is projected to increase by around 0.8% per annum over the 20-year period from 2011 to 2031, which translates to a need for 4,400 jobs in North Dorset over the same period'.
- 4.3 The Workspace Strategy 2012 Update (SED005) analysed FTE employment growth by sector and projected for the two 10-year periods 2011 to 2021 and 2021 to 2031. This analysis showed that about two thirds of the growth in FTE jobs was projected to take place in the first decade with the remaining one third after 2021. As paragraph 6.16 of LP1 states: 'on that basis, it is estimated that approximately 3,630 FTE jobs will be required during the plan period (2011 to 2026) with a further 770 FTE jobs required between 2026 and 2031'.

### Meeting the Need for Employment Land to 2031

- 4.4 On the basis of the economic growth and job projections, LP1 identifies a need for 26.2 hectares of employment land in North Dorset for the period 2011 to 2026. However, the Workspace Strategy 2012 Update (SED005) also identified the future need for employment land up to 2031 and commentary on this is provided in the supporting text.
- 4.5 Paragraph 6.20 of LP1 states 'the projections showed a need for 30.5 hectares of employment land for the period 2011 to 2031, including a 20% flexibility allowance. The projections indicate that 21.9 hectares are required between 2011 and 2021 and 8.6 hectares are needed in the period 2021 and 2031'.
- 4.6 The availability of employment land in North Dorset was examined in 2011 and 49.6 hectares were identified as being available across the District. This is sufficient to meet the need for employment land not only to 2026, but also to 2031. Since more than sufficient employment land already exists to meet employment needs to 2031 no further provision would be required if the Plan period was extended to that date.
- 4.7 A review of the Bournemouth, Dorset and Poole Workspace Strategy has commenced with a view to informing the formation of the next round of Local Plans across the area.

### **Correlating Hectares and Jobs to 2031**

- 4.8 In Question 3.4 of the hearing sessions, the Inspector sought clarification on the correlation between hectares and job provision. In response the Council made the point that there was no straightforward correlation, because the number of jobs created would depend on the types of employment (or other uses) that were built. However, as part of the work to inform the preparation of the Dorset LEP's Strategic Economic Plan (SED004), the Council undertook a simple 'bottom up' check to examine the capacity of the key strategic employment sites at the four main towns. This was set out in Appendix 1 to the Council's Hearing Statement on Issue 3: Supporting Economic Development.
- 4.9 This simple 'bottom up' check estimated that about 4,490 jobs could be provided on the five key strategic sites at the four main towns, which extend to about 33 hectares (out of 49.6 hectares of the total available employment land identified in the District).
- 4.10 This basic 'reality check' shows that the key strategic sites, which represent about 66% of the total available employment land identified in the District, have sufficient capacity to accommodate the overall level of job provision envisaged to 2031 (i.e. 4,400 FTE jobs). Since more than sufficient employment land already exists to meet the projected increase in jobs to 2031, no further provision of employment land would be required if the Plan period was extended to that date.

## 5. The Need for an Early Review of the Local Plan Part 1

### Putting LP1 in Place

- 5.1 It is important to put LP1 in place as soon as possible as this will give complete local plan coverage of the Eastern Dorset HMA against the housing needs projected in the 2012 SHMA Update. The estimates of housing need for all other local authorities in Eastern Dorset, as established in the 2012 SHMA Update, have been successfully tested at examination, the most recent being the examination of the Christchurch and East Dorset Local Plan.
- 5.2 For North Dorset, putting LP1 in place will enable broad locations for growth to be brought forward for development in accordance with an adopted development plan. This will give certainty to developers which, together with the current improvement in economic conditions will help to ensure that the (revised) housing trajectory in LP1 will be delivered.
- 5.3 Figure 5.1 sets out the figures from the 2012 SHMA Update for the local authorities across the HMA and compares these figures with the annualised housing provision figures in the current round of Local Plans (including LP1). It also summarises the figures for projected household growth on the basis of the 2008 and 2011 DCLG household projections. It shows that the overall level of provision exceeds not only the figures from the 2012 SHMA Update, but also both sets of earlier projections.
- 5.4 The 2012 SHMA Update, being the most up to date, robust and tested piece of evidence is therefore considered to be the most appropriate assessment of housing need upon which to base the housing requirement in LP1. Figure 5.1 shows that local authorities across the HMA, having taken time to consider the environmental and policy constraints in the area, have been able to make adequate provision to meet (and exceed) the objectively assessed need for the HMA as a whole. As outlined earlier in this note, it would be possible to extend the period of LP1 to 2031 and meet the identified need for housing over the longer Plan period within the constraints in North Dorset.

### The Need for an Early Review of LP1

- 5.5 A new SHMA based on the DCLG 2012 household projections is currently being produced. The new SHMA is required to inform the review of local plans in Bournemouth, Poole and Purbeck and will also inform the review of all other local plans across the HMA. Local authorities will need to work together more closely to co-ordinate local plan production and in order to achieve this an early review of LP1 will be required.

- 5.6 Work on the new SHMA stalled because the release of the 2012-based household projections from DCLG which was expected in autumn 2014 but was delayed until 27<sup>th</sup> February 2015. The methodology was not released until 2<sup>nd</sup> March 2015 and the detailed tables for modelling were delayed still further until 10<sup>th</sup> March 2015. At the current time, work on the preparation of the Eastern Dorset SHMA is ongoing.

Figure 5.1: Local Plan Targets and Household Growth Projections

Local Authority area	CLG 2008-based annual household growth 2011-21	CLG 2011-based annual household growth 2011-21	2012 SHMA Update annual household change 2011-31	Local Plan targets <sup>1</sup>
Bournemouth	408	629	511	730
Christchurch	199	224	219	566 <sup>2</sup>
East Dorset	330	292	336	
North Dorset	252	175	273	(280)
Poole	488	597	467	500
Purbeck	171	130	170	120
<b>HMA Total</b>	<b>1,848</b>	<b>2,047</b>	<b>1,976</b>	<b>(2,196)</b>

- 5.7 Looking forward to when LP1 is adopted, the final assessment of housing need arising out of the Eastern Dorset SHMA will be considered on an HMA-wide basis. This review will include all local authorities within the HMA considering how the sustainable distribution of growth will best be achieved in line with the Duty to Co-operate. It will be undertaken alongside full consideration of constraints including Green Belt, AONB and international wildlife designations and will be reflected in an HMA-wide review of Local Plans.
- 5.8 This approach very much reflects the Government's position as set out in Brandon Lewis's letter of 19<sup>th</sup> December 2014 to Simon Ridley, Chief Executive of the Planning Inspectorate. This letter confirmed that the SHMA *'is just the first stage in developing a Local Plan'* and clarified that the Local Plan target is the one that should be tested as being deliverable, rather than the objectively assessed need.
- 5.9 The letter states 'councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on

<sup>1</sup> Figures in brackets have not yet been tested through a Local Plan examination.

<sup>2</sup> Christchurch and East Dorset Councils have produced a joint Core Strategy covering the two local authority areas.

their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. Only after these considerations are complete will the council's approach be tested at examination by an Inspector. Clearly each council will need to work through this process to take account of particular local circumstances in responding to Strategic Housing Market Assessments'.

- 5.10 As with the Eastern Dorset SHMA, a review of the Bournemouth, Dorset and Poole Workspace Study has commenced with a view to the results informing the review of local plans across the area.
- 5.11 Once the Eastern Dorset SHMA and the revised Bournemouth, Dorset and Poole Workspace Study are finalised and published, the Council will consider the implications of the new evidence, in line with the position in the Brandon Lewis letter. This will include engagement with local authority and other partners to resolve any strategic issues that arise in accordance with the Duty to Co-operate.

## Dorset Governance Review

- 5.12 The Dorset Leaders' Growth Board has already begun a governance review (Document NDDC Issue 1B), the outcome of which is likely to provide enhanced arrangements for addressing Duty to Co-operate issues. The Executive Summary of Document NDDC Issue 1B (on Page 4) states: 'the review concludes that the creation of a Dorset Combined Authority, with the alignment of accountability, governance and geographies for economic development, regeneration and transport would provide Dorset with the best possible chance of securing significant and lasting improvements in economic development, regeneration and transport'.
- 5.13 The intention is also to align 'strategic land use' with the powers and responsibilities of the combined authority, as set out on Page 20 of Document NDDC Issue 1B, which states: 'the maximum benefit would be gained by integrating and bringing together at a strategic level those functions across the Dorset Region that enhance economic prosperity. These are likely to include economic development, transport, housing, strategic land use, employment and skills. The extent of the decision making powers that are given to the Combined Authority is a crucial detail in the scheme that is developed. Full powers could be given for some functions (e.g. transport) whilst for other functions, the powers could be limited to co-ordination and recommendation (e.g. strategic land use)'.

## Discussion

- 5.14 It is important to put LP1 in place to achieve complete coverage of the Eastern Dorset HMA and to help ensure that the (revised) housing trajectory in LP1 will be delivered. It is however recognised that an early review of LP1 will be required in order to more closely align local plan production across the HMA.



- 5.15 The recent letter from Brandon Lewis to Simon Ridley, Chief Executive of the Planning Inspectorate clarifies the process that any such review should follow recognising that a new SHMA is only the 'first stage in developing a local plan' and that there is a process to work through 'to take account of particular local circumstances in responding to Strategic Housing Market Assessments'.
- 5.16 Whilst the new SHMA will provide the evidence for such a review the outcome of the Dorset Governance review, which is already underway, will provide enhanced arrangements for addressing any Duty to Co-operate issues.

## 6. The Relationship Between the Local Plan Part 1 and Part 2

### The Role of LP1

- 6.1 The role of LP1 is summarised in paragraph 1.13 of the Submission Document, which states 'Part 1 of the Local Plan as a whole (including all the policies, supporting text and any maps, diagrams and figures) sets out the strategic priorities for the future development of North Dorset'.
- 6.2 Paragraphs 1.11 and 1.12 clarify that all the policies within LP1 are 'strategic policies'. The topic-based policies establish an overall sustainable development strategy (Policies 1 and 2) and set out a strategic approach to: environment and climate change; meeting housing needs; supporting economic development; and infrastructure (Policies 3 to 15). A strategic approach to development in the District's four main towns and in the countryside is provided by policies 16 to 20. The largest single area of development in North Dorset will be the Gillingham Southern Extension, a strategic allocation (Policy 21). LP1 also includes strategic Development Management Policies (Policies 22 to 33) which provide more detail on a range of issues and types of development, including development in the countryside. LP1 concludes by establishing a framework for monitoring.

### The Role of LP2

- 6.3 The Council has committed to preparing a Local Plan Part 2 (LP2) and its role is summarised in paragraph 1A, which states: 'the two-part approach will see a strategic policy framework put in place in advance of specific sites being allocated (with the exception of the Strategic Site Allocation at Gillingham) and more detailed policies being reviewed. This approach ensures that sufficient provision is made to meet objectively assessed needs, through the identification of broad locations for development in Part 1, whilst also providing some flexibility in Part 2. It also provides choice to local communities in the four main towns to decide whether they want to lead on defining sites and reviewing detailed policies through their neighbourhood plans, or whether the Council should lead on these matters in taking forward Part 2.'
- 6.4 LP1 provides a strategic framework for making planning decisions through LP2, through the preparation of neighbourhood plans, which should focus on non-strategic planning decisions, and for the determination of planning applications.

## Bringing Forward ‘Broad Locations’ Through Planning Applications

6.5 To facilitate bringing forward ‘broad locations for housing growth’ through the planning application process, the wording of Policy 2 and paragraph 3.55 of LP1 which deal with the issue of settlement boundaries, have been changed. These changes were discussed and agreed by the Council at the meeting on 28 November 2014, when it was resolved to submit LP1. Paragraphs 25 to 27 of Agenda Item 6 state:

‘25. A number of agents representing key housing sites were concerned about the statement in Policy 2 that sought to continue to use the existing settlement boundaries around the four main towns (as defined in the 2003 Local Plan) for development management purposes, as most of the ‘broad locations for housing growth’ shown diagrammatically on the inset maps in the Pre-submission Document were outside these boundaries.

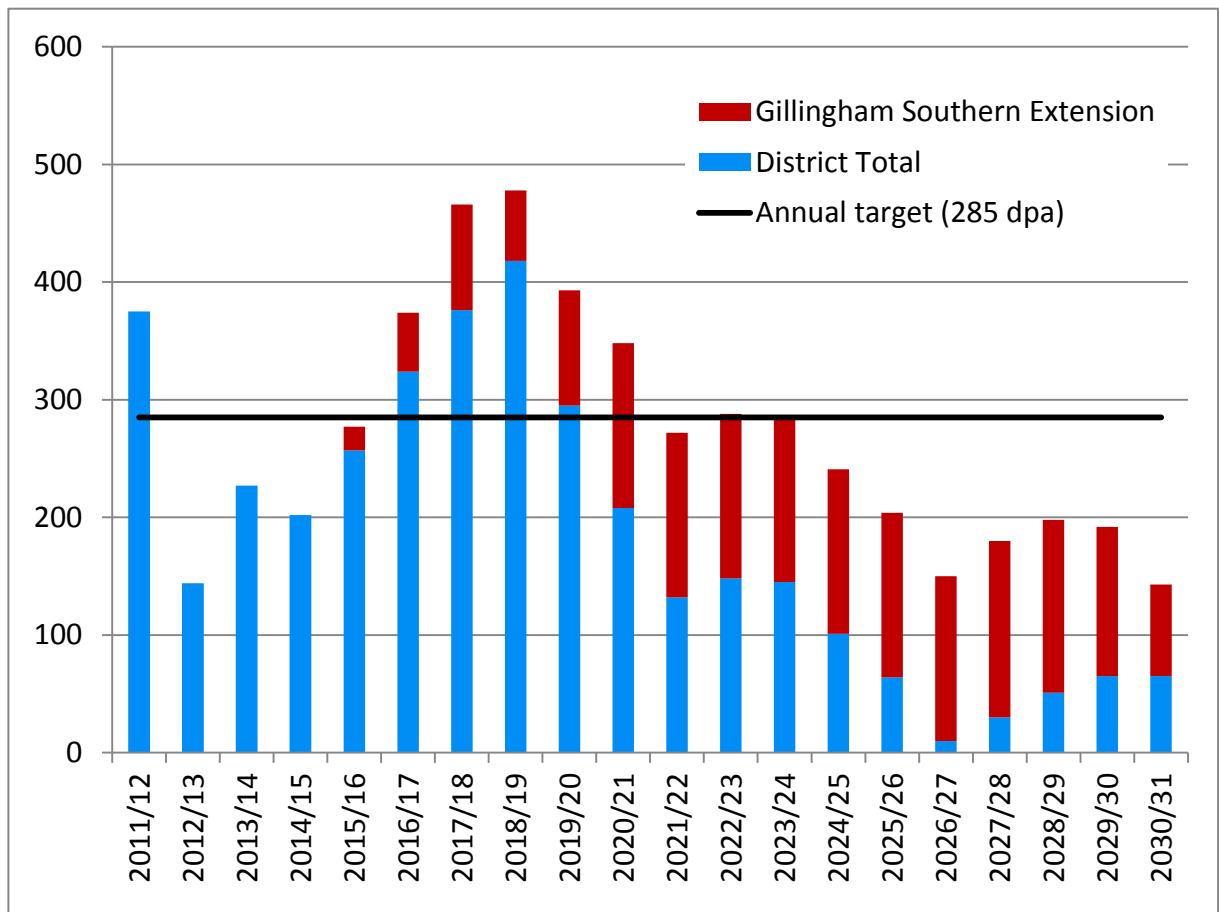
26. Some respondents expressed the view that these broad locations should be formally allocated (and shown on an Ordnance Survey base map) in the Local Plan Part 1 as is the case with the Strategic Site Allocation (SSA) at Gillingham and that formal allocation should not be deferred until the Local Plan Part 2. The allocation of sites in the Local Plan Part 1 would be likely to require significant additional work and would delay the submission of the plan. Also there have already been pre-application discussions on a number of the sites.

27. An amendment to the policy and the supporting text is proposed to indicate that the settlement boundaries will be used for development management purposes ‘alongside the proposals for housing and employment growth and regeneration, as set out in Policies 16, 17, 18, 19 and 21’. This wording change would effectively enable development to be brought forward on these sites in advance of the Local Plan Part 2. It will also enable the Council to argue that such sites should be included in the five year supply, where proposals are sufficiently well advanced, as there would be no policy constraint to delivery.’

## Frontloading Housing Delivery

6.6 A revised housing trajectory has been prepared and is included as Figure 6.1 below. This shows that there will be relatively high levels of delivery in the five years from 2015/16 onwards reflecting the bringing forward of a number of sites at the ‘broad locations for housing growth’ in accordance with Policy 2 (and paragraph 3.55) of LP1 - where there have already been pre-application discussions; where environmental assessment screening opinions (and in some cases scoping opinions) have already been issued; or where planning applications have already been submitted.

Figure 6.1: Revised Housing Trajectory



6.7 The revised housing trajectory also shows that the level of delivery anticipated from the Gillingham Southern Extension in the five years from 2015/16 onwards is relatively modest. In view of the likely lead in times, the Council recognises that it would not play a major role in ‘frontloading’ delivery over the next five years, but would provide a ‘bedrock’ for delivery in the longer term, from about 2018/19 onwards.

## Scenarios for the Review of the Local Plan

6.8 The housing trajectory suggests that levels of delivery over the next five years will be well above the figure of 285 dpa. A new SHMA for the Eastern Dorset HMA currently in production and will establish an objectively assessed need figure to inform the revision of LP1. The result of the SHMA, subsequent strategic planning work with partner authorities in Eastern Dorset and consideration of the sustainability issues associated with the location of new development, will be used to establish the scope of any revision.

6.9 In the event that the new SHMA and subsequent work indicated a similar or a lower level of need for housing in North Dorset, any review of LP1 would be ‘light touch’. The preparation of LP2, which could remain as a separate document, could then

focus on formally allocating any sites at the ‘broad locations for growth’, which had not yet been developed or granted planning permission.

- 6.10 In the event that the new SHMA and subsequent work indicated a higher level of need for housing in North Dorset, it is likely that LP1 would need to be reviewed more urgently. Any short-term surplus in housing delivery over the next five years would give the Council time to review LP1 and make additional provision as required. In these circumstances, it is likely that LP1 and LP2 would be consolidated as a single document, which would seek to not only increase the overall level of housing provision, but also to formally allocate sites for growth.
- 6.11 In either scenario putting LP1 in place now would enable the frontloaded ‘broad locations for housing growth’ to come forward early in accordance with adopted policy, and would provide sufficient plan-led housing development over the next five years to enable a review of housing needs (and provision) to be undertaken in a timely manner, without shortfalls in supply, potentially leading to ‘planning by appeal’.
- 6.12 Working with its partners across the Eastern Dorset Housing Market Area work has already commenced on the production of a revised SHMA. Similarly, work has commenced on the revision of the Workplace Strategy for the area. These two pieces of evidence will be considered appropriately and will inform the revision of Local Plans across the Eastern Dorset area enabling Local Plan timeframes to be aligned.

## 7. Conclusions

- 7.1 This note explains how it would be possible to extend the Plan period to 2031 and make provision for the additional housing required by:
- amending the approach to housing and employment growth in rural areas (i.e. outside the four main towns); and
  - adjusting the assumed capacity of certain broad locations for growth already identified in LP1.
- 7.2 Putting LP1 in place will achieve complete coverage of the Eastern Dorset HMA and to help deliver the (revised) housing trajectory, although it is recognised that an early review of LP1 will be required in order to more closely align local plan production across the HMA.
- 7.3 The new SHMA will provide the evidence for such a review, which should be undertaken in accordance with the process outlined in the recent letter from Brandon Lewis to Simon Ridley, Chief Executive of the Planning Inspectorate. The outcome of the Dorset Governance review will provide enhanced arrangements for addressing any Duty to Co-operate issues, as part of this process.
- 7.4 Whatever form the review takes, there are clear advantages to putting LP1 in place now. This approach would enable the frontloaded 'broad locations for housing growth' to come forward at an early stage in accordance with adopted policy. It would also ensure the provision of sufficient plan-led housing development over the next five years to enable a review of housing needs (and provision) to be undertaken in a timely manner, without shortfalls in supply, potentially leading to 'planning by appeal'.