

Dear Ms Jordan,

Further to my note advising that I have continuing concerns with aspects of the Local Plan, I have set out further details below. As explained, I think these can best be dealt with by holding an Exploratory Meeting to discuss whether they are likely to affect the soundness of the Plan and, if so, what might be the most appropriate action to address them.

I have no particular thoughts as to what is the best way forward because this will depend on the outcome of the meeting. However, similar problems have arisen with other local plans requiring, at the very least, the need for further work.

I have two principal areas of concern in relation to the Duty to Cooperate and housing provision. Other matters also add to my reservations and I would welcome the opportunity to discuss these as well.

1. Duty to Cooperate

1.1 Both Councils have agreed they are prepared to work with other Authorities on strategic matters that go beyond the boundaries of a single administrative area. In light of this a draft Memorandum of Understanding on the Duty to Cooperate has been prepared. A separate Memorandum of Understanding has also been agreed between West Dorset and South Somerset. It appears the objective behind these memoranda is to show the intention of the councils to work together and deal with issues which were previously part of the regional planning process rather than the NPPF or the Localism Act.

1.2 While the authorities have been working towards common ends I am concerned that, with the exception of proposals for the Littlemoor area, there are a number of cross-border matters which have not been resolved. Strategic issues have been identified (as in the case of Lyme Regis/Uplyme; Crossways/Morton and on the edge of Yeovil) but it is not obvious what the implications are for the areas in question and how these matters will be tackled. Instead, the Memorandum seems to be doing no more than 'agreeing to agree'. Consequently, I have doubts as to whether an effective strategy will be in place to deal with cross-border strategic matters on adoption of the Plan.

2. Housing issues

2.1 You acknowledge the changes proposed to the West Dorset element of the Joint Local Plan (LP) means a review would be necessary to meet the housing target for the District by the end date of the plan period in 2031. This could be seen as a pragmatic approach to resolving the difficulties the Council appears to have had in bringing housing sites forward. However, I am concerned it masks a number of problems linked to both the Duty to Cooperate and the assessment of housing needs.

2.2 I do not consider having in effect, two end dates for a joint plan could be regarded as sound especially when the National Planning Policy Framework (NPPF) expects local plans to be comprehensive documents meeting identified needs for the plan period (para. 159). It is reasonable to review a plan, in whole or part, in response to changing circumstances (para. 153) but the intention is for local plans to provide a realistic strategy at the outset. Accepting there is a deficiency in housing sites to begin with is difficult to equate with the concept of positive and effective planning.

2.3 In itself, it may be possible this can be overcome through modifications and it is an issue which, in part at least, arises because of the joint plan format. Even so

my concerns are more fundamental because I have reservations about the evidence supporting the housing need assessment for both plans.

- 2.4 Despite work to update the original Strategic Housing Market Assessment (SHMA) it is essentially out-of-date. The original study was undertaken when the approach to housing needs was different and when the emerging Regional Strategy (RS) provided the basis for determining the growth in each district. Although the RS remained in draft form and has since been revoked, it provided a rigorous and independent approach to assessing housing needs and a context for understanding the demands on each area. It would be helpful, in my view, to know what and how circumstances have changed since the draft RS was produced and what factors have influenced and led to the housing numbers which are being advocated in the current Plan.
  - 2.5 In taking account of the 2011 ONS<sup>1</sup> household projections I appreciate the Councils have endeavoured to justify their latest stance. Unfortunately, this appears to be based on national trends rather than how these might be affected by local circumstances which in turn would influence the scale and nature of housing needs at District level. More than one respondent, for instance, has pointed out that if there is insufficient housing to accommodate economically active residents planned levels of economic growth may be dependent on in-commuting to West Dorset. A strategy which gives rise to unacceptable levels of commuting is not sustainable nor is it likely to be effective or justified.
  - 2.6 The 2011 Census found there were more people but fewer households than expected, meaning that average household size did not decrease between censuses<sup>2</sup>. A number of factors seem to have contributed to this including migration and changes to household formation patterns. These trends vary according to local factors and there is evidence to show that neighbouring authorities can have very different growth rates. National trends establish a framework but it is imperative in my view, that evidence is provided to show how local factors may influence trends observed at regional or national level.
  - 2.7 I am aware that the ONS published their 2012-based national population projections for the UK on 6 November 2013. The results will provide the basis for 2014 DCLG household projections and are relevant to future housing requirements. Initial indications suggest that household formation rates used in the 2011-based projections were too low and that population growth varies considerably between different age groups. While details are not yet available, preliminary findings suggest the need to fully appreciate the components of household change. In essence, I have yet to be convinced that the Councils have undertaken an objective assessment of their housing needs.
  - 2.8 I have also found it difficult to understand the housing supply situation including past performance and whether a 5% or 20% buffer is needed to comply with para. 47 of the NPPF. I am unclear, for instance, as to the contribution of 'windfall' sites and their relationship, if any, to minor sites. While appreciating the desire to promote Neighbouring Planning to aid housing delivery, it is not clear what contribution these can make and what evidence exists to show how likely they are to be realistic sources of supply.
3. Affordable housing
    - 3.1 The Councils have concluded that it is impossible to deliver sufficient affordable housing to meet existing and future needs even though this is a significant issue. What evidence exists to show the Councils have fully explored options to delivery more affordable housing or justify why provision should be curtailed. Has the

---

<sup>1</sup> Office for National Statistics

<sup>2</sup> The first time in over 100 years that average household sizes have not fallen.

high demand for affordable housing been explored for instance with neighbouring authorities as part of the Duty to Cooperate and have all other reasonable means of increasing delivery been fully considered?

4. Supplementary Planning Documents

4.1 Your response to my concerns regarding future SPDs provides some comfort that these would not be looking to introduce new policy or allocate sites which would be contrary to the 2012 Local Planning Regulations. However, the reference in your reply to not 'fundamentally' changing the policy approach (in the Coastal Change Management SPD) leaves some doubts as to whether my point has been fully accepted.

5. Consultation process

5.1 I am concerned that potential respondents to consultation events may have found the process confusing particularly as sites have changed before and after the Plan was submitted. I am worried that late changes to the Plan following committee meetings in May 2013 has added to the uncertainty increasing the risk that members of the public and other stakeholders have not commented because they did not understand what constituted the revised form of the Plan. In addition, I have found it difficult to understand the changes being proposed in the potentially 'revised' version of the Local Plan because of the confusing mix of blocked and coloured text.

6. Overall concern

6.1 Development plans evolve throughout their preparatory stages so that changes prior to submission are to be expected. Similarly, while plans on submission should be complete it is not unusual for further changes to come forward. Nevertheless, in this particular instance, the Plan appears to have evolved as a reaction and counter-reaction to representations rather than as a well-honed strategy which promotes a logical and reasoned means of addressing the difficult issues facing both authorities. Because of this, I remain to be convinced that the spatial strategy represents a realistic approach to the future planning of the area and one which is supported by the evidence base.

Paul Crysell  
Inspector  
10 December 2013