

# Cabinet

## 6 October 2020

### 'Planning for the Future' White Paper: consultation response

#### For Decision

<b>Portfolio Holder:</b>	Cllr D Walsh, Planning
<b>Local Councillor(s):</b>	All members (all wards are affected)
<b>Executive Director:</b>	J Sellgren, Executive Director of Place
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**Report Status:** Public

#### Recommendation:

That a response be sent to Government, setting out the following as the views of Dorset Council on the White Paper, as well as the more detailed points made in section 9 of this report:

1. That delays in house building nationally are not all due to the planning system – local planning authorities do not build houses - but to other factors including market absorption, the homogenous nature of large developments, and reliance on the private sector for infrastructure provision, as identified in the Letwin review. In the last decade, 2.5 million homes were granted planning permission but only 1.5 million were delivered; similarly in 2019, 371,000 homes were given permission but only 241,000 were delivered;
2. That binding national housing targets and removal of the opportunity for people to comment at outline planning application stage on sites allocated for growth in plans will reduce the ability of communities to have input into proposals affecting their local areas, and reduce local democracy;
3. That greater detail is required on how the national housing targets would be derived, including how environmental constraints will be

taken into account, and that this must include an element of national planning strategy setting out the aims for how places will grow and the infrastructure needed to support them;

4. That the proposed timescale for the adoption of new style plans is very ambitious bearing in mind the need for the introduction of new primary legislation, the proposed 'front loading' of community engagement and the greater level of technical work necessary if growth areas will receive automatic outline planning permission;
5. That there is significant risk to the progress of currently emerging local plans due to the uncertainty around, and scale of, these changes;
6. That if national policies are not to be repeated in local plans, they need to carry the same weight in decision making as development plan policies. Some local 'development management policies' will still be necessary to set out local mechanisms and approaches to addressing national policy issues – for example local solutions to addressing indirect effects of development on protected habitats;
7. That there is no reference to what if any effect these changes are intended to have on minerals and waste local plans, how policies and site allocations for minerals and waste would be applied under the zoning system and how minerals safeguarding can be achieved;
8. That while the support for good design and the publication of a national design code are welcomed, it is important that these focus not only on what places look like, but how they work for those living and working in them. Masterplanning also needs to consider infrastructure provision and mitigation of impacts on habitats, flood risk, heritage and landscape.
9. That the replacement of the Community Infrastructure Levy and Section 106 planning agreements with a single levy is not likely to generate sufficient funding for the infrastructure and affordable housing that is needed, particularly bearing in mind the exemptions proposed. We would support the ring fencing of funding for affordable housing to ensure that this is not reduced;
10. That while an increased reliance on digital methods of engagement and involvement may well attract a wider audience to comment on planning proposals, it will potentially disadvantage older people and those in more deprived areas who may have less access to digital means of communication.

### **Reason for Recommendation:**

The White Paper proposes radical changes to the current planning system of England, which will have significant impacts on Dorset, its communities and the council. It is important therefore to respond to the consultation in order to influence the outcome and ensure that the proposals do not adversely affect our

area, in particular as a consequence of the binding housing targets and reduction in democratic and community involvement in decisions.

## **1. Executive Summary**

- 1.1 Two consultation papers were published by the Government in August: a White Paper 'Planning for the Future' that proposes radical changes to the planning system in England; and a second paper outlining changes to the current planning system that would take effect in the interim before any changes arising from the White Paper were implemented. An officer response approved by the Planning portfolio holder has been sent for the second paper as the deadline for comments fell before the Cabinet meeting, but this report seeks Cabinet approval for a response to the consultation on the White Paper. This consultation closes on 29 October.
- 1.2 The changes set out in the White Paper have been prompted by the Government's concerns about the lengthy and complex nature of the current planning system and the need to bring forward housing and other development more quickly.
- 1.3 The White Paper proposes that housing targets for each council area would be set nationally and that these would be binding on councils. Local plans would have to map every part of their area as suitable for growth, renewal or protection – making sure that enough land is identified for growth to meet the housing target. In areas identified for growth or renewal, developers would not need to apply for outline planning permission as this would automatically be secured for the forms and types of development specified in the plan. Communities would be involved at plan-making stage, but would not have the chance to comment again on the principle of development at application stage.
- 1.4 Plans would specify the type of development that would be allowed within each growth area, and would include design codes that developments would be required to follow, but they would not include general policies against which development proposals would be assessed, relying instead on national policy.
- 1.5 A new infrastructure levy would replace the existing Community Infrastructure Levy and section 106 planning agreements, so that all arrangements with developers for infrastructure provision, including affordable housing provision, would be dealt with under the same levy.
- 1.6 There are some positive aspects of the proposals, such as the emphasis on good design, and it is acknowledged that there are significant complexities and difficulties in the current system. There are however

serious concerns about the consequences of binding national housing targets and the removal of the outline planning application stage, both of which will reduce local communities' ability to influence and shape their local area.

- 1.7 The changes would have significant impacts on the completion of a Dorset Council Local Plan, which is a very high priority for the council. The paper proposes that the new style plans would take 30 months to prepare, that this timescale would be mandatory, and that they should all be adopted by the end of this parliament – ie by April 2024. This would require the necessary new legislation to be introduced very quickly, and the mandatory timescale would restrict the extent of community engagement that was possible in the preparation of the new plans.

## **2. Financial Implications**

The council has reserved budgets for the costs required in developing a new Dorset Council Local Plan. If the proposals are implemented as suggested in the paper, a completely new style of plan will need to be adopted by 2024 and so the work will need to change significantly part-way through its preparation. This could result in abortive work and additional costs, particularly bearing in mind the amount of detail that would be required if the proposals are enacted in their current form.

## **3. Climate implications**

The White Paper encourages development to be zero carbon from the start rather than requiring adaptation later, which is supported.

Decisions about the location of growth have significant climate implications because of their effect on travel patterns. These decisions will continue to be made through local plans, but the binding housing target may restrict the level of choice the council has on the matter.

## **4. Other Implications**

It is proposed that sustainable development continues to be the primary aim of the planning system and that this will be the key test against which local plans will be assessed.

The zoning system will affect council properties and the council as land and property holder will need to have input at the early consultation stage.

The design and layout of development can have implications for public health, community safety and levels of physical activity, which will need to be taken into account in developing local design codes.

Resources within the planning department to deal with the implications of the changes would need to be considered, and there are likely to be training implications such as those arising from a greater use of design codes. There will also be training and resource issues for voluntary groups preparing neighbourhood plans.

## **5. Risk Assessment**

Having considered the risks associated with this decision, the level of risk has been identified as:

Current Risk: medium

Residual Risk: medium

There are clear risks for the preparation of the Dorset Council Local Plan and for the future democratic involvement in planning decisions, should the changes take place.

## **6. Equalities Impact Assessment**

The Government will be responsible for undertaking equalities impact assessment of its proposed changes. One matter proposed to be raised in the council's response is that the increasing digitalisation of the planning process will potentially prejudice older people, those with certain disabilities, and those on lower incomes who are less likely to have access to digital means of communication.

## **7. Appendices**

Appendix 1: Dorset Council response to the consultation on changes to the current planning system

## **8. Background Papers**

Planning for the Future: White Paper, August 2020, available at:

<https://www.gov.uk/government/consultations/planning-for-the-future>

One-page summary of the White Paper proposals, published by MHCLG:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907469/One\\_Pager\\_v4.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907469/One_Pager_v4.pdf)

Consultation on changes to the current planning system:

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

## 9. Background and summary of the White Paper proposals

- 9.1 The White Paper, 'Planning for the Future' was published on 6 August and proposes what it describes as 'radical reform' to the planning system of England, 'tearing it down and starting again'. The aims are for a system that is simpler, clearer and quicker; actively encourages sustainable, beautiful, safe and useful development; makes it harder for developers to avoid contributing to infrastructure; opens up the market to a greater variety of builders; gives people a greater say over the future of their areas; makes sure that businesses have space to grow; and above all that gets more homes built.
- 9.2 The document is divided into three main sections or 'pillars': planning for development; planning for beautiful and sustainable places; and planning for infrastructure and connected places.
- 9.3 The table in the following section of this report provides a summary of some of the key points made in each section of the White Paper, with officer comments alongside them.

	<i>White Paper summary</i>	<i>Officer comments</i>
<b>PILLAR 1: PLANNING FOR DEVELOPMENT</b>		
Q5	Radical changes are proposed to local plans. Planning law will be changed and the process streamlined, so that democratic and community involvement takes place primarily at the plan-making stage.	Removal of the opportunity for people to comment at outline planning application stage on sites allocated for growth in plans will reduce the ability of communities to have input into proposals affecting their local areas, and reduce local democracy.
Q5	Plans are proposed to be simplified, based on a standard digital map template and significantly shorter, with a zoning system identifying land under three categories; <ul style="list-style-type: none"> <li>• <b>Growth:</b> areas suitable for substantial development, and where outline planning approval for development would be automatically secured for those forms and types of development specified in the plan;</li> </ul>	As above, there is concern about loss of local democracy in relation to the identification of growth areas. There would also need to be a significantly greater amount of technical work undertaken at plan making stage if site allocations were to have automatic outline planning permission. Plan proposals may require Environmental Impact Assessment as well as Strategic Environmental Assessment. There is no mention of minerals and waste

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	<ul style="list-style-type: none"> <li>• <b>Renewal:</b> areas suitable for some development, where permission in principle or local development orders may be used to bring development forward</li> <li>• <b>Protected:</b> areas where development is restricted, and where full planning applications would be required for any development proposals.</li> </ul>	<p>in the paper, and no indication therefore of whether minerals and waste planning is intended to be included within the new approach or whether they should continue to be planned for separately. Minerals in particular have to be worked where they are found, which does not fit easily within the three zoning categories proposed. National planning policy would need to include policies for the management of waste and supply of minerals if these are no longer to be included in local plans, and there is also a need to consider how minerals safeguarding could be achieved under the proposed zoning system.</p>
Q6	<p>Local plans would be expected to set clear rules for the areas proposed for development, stating what would be allowed, rather than general policies against which proposals would be assessed. Policies in Local and Neighbourhood Plans would be in machine readable format so that wherever feasible, they can be used by digital services to automatically screen developments and help identify where they align with policies.</p>	<p>Planning decisions often involve the use of professional judgement to assess and weigh up the material factors in a case. It is therefore not possible to distil planning decisions down to a simple decision about whether it aligns with policy or not. An important example would be where there is the potential for impact on a nearby heritage asset impacting on its setting.</p>
Q6	<p>General development management policies would all be set out nationally, rather than in local plans, though alternatives are suggested, including allowing some local development management policies provided that they do not duplicate national policy.</p>	<p>It should be noted that one of the reasons for repeating national policy in local plans is that the legislative weight of the development plan does not apply currently to national policy, and this should be taken into account in planning any changes.</p> <p>While it is recognised that the proposals would reduce duplication and help to make plans shorter, there will be situations when a local policy approach is important, particularly where it is necessary to set out a local approach to meeting a national policy – for example the approaches to mitigating against the impact of development on protected habitats (such as Suitable Alternative Natural Greenspace provision to reduce impacts on heathlands). There should therefore be</p>

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		scope for local policies where they do not duplicate national policy and are necessary to reflect the local context.
Q7	Sustainability appraisal would be abolished and replaced with a simplified process. The Duty to Cooperate will be removed, and there will be a slimmed down deliverability test at examination.	The simplification of the sustainability appraisal process is supported as it should remove much of the 'process' that exists around the SA around it. Any replacement must however be robust and focused on positive outcomes for promoting sustainable development. Removal of the Duty to Cooperate is supported as it has not been effective and has delayed plan making. While it has not worked in relation to housing numbers, there is still a need for strategic planning to make decisions about where growth and infrastructure investment should be focused, and how cross-boundary issues will be addressed. The slimmed down delivery test is supported.
Q8	Under the first section on 'planning for development' the paper sets out the proposal for binding housing targets to be set for each local planning authority area at national level, rather than the current system in which a standard national methodology for deriving housing targets is expected to be used, councils must also try to meet any unmet need from adjoining areas, and councils may use alternative methods of deriving their figures if there are exceptional reasons to do so.	Binding targets would remove any debate about housing targets from local plan examinations, and would also remove the current requirement to consider unmet need from adjoining areas, under the 'duty to cooperate'. This would save time at examinations but there would be no local democratic input into the housing number for the area. Greater detail is required on how the national housing targets would be derived, and this must include an element of national planning strategy.
Q8	Unlike the current standard methodology, which uses household forecasts and affordability data as its two inputs, and the interim proposals for adjustments to that method, it is proposed that the new binding targets would also take account of environmental constraints.	This is essential for targets that will be binding, but there is no detail yet as to how the figures would be worked out and how environmental constraints would be considered. It will be important that this takes account of indirect environmental effects (such as the areas within which development can have adverse impacts on internationally protected nature conservation sites, or the settings of heritage assets) as well as the proportion

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		<p>of an area that is covered by various constraints.</p> <p>The distribution of development must be based not only on data but also on a strategy for how areas should grow and the infrastructure needed to support them. By setting binding development targets for all areas, the system would be establishing a national distribution of development, but there is no indication that a national strategy, taking account of aims and aspirations for the different parts of the country, will feed into it.</p>
Q8	<p>There would no longer be a continued requirement to demonstrate a five year supply of land for housing, as plans should identify sufficient land under the new proposals. The Housing Delivery Test would however be retained, in order to check that delivery was taking place.</p>	<p>The five year land supply calculations took up significant time at local plan examinations and planning appeals, and removal of the requirement would certainly help to simplify the system and reduce time. But the housing delivery test penalises local councils for failure to deliver, which is not in the councils' control: it is developers that build houses, not local councils.</p>
Q9	<p>It is proposed that radical improvements to community engagement at plan-making stage would be made, but that consultation on applications would be 'streamlined', removing the opportunity for people to comment at outline planning application stage if an area of land is already identified for growth in a local plan.</p>	<p>Removing the opportunity for people to comment at outline application stage would reduce local democratic involvement. While 'front loading' of this engagement at plan making stage is proposed, this would be very difficult within the restricted timescale set out for local plan preparation.</p>
Q9	<p>Where a departure from the plan was proposed by a developer, a full planning application process would be required and this would be decided based on consideration of national planning policy.</p>	<p>There is a significant lack of detail about how this process would work. What level of departure from the Local Plan would require a planning application? Would there be a right of appeal? The reliance on national planning policy involves further centralisation of the planning process, removing local democracy from the decision making process.</p>
Q9c	<p>Decisions on new settlements could be made by the Nationally Significant Infrastructure Projects regime, rather than locally.</p>	<p>If a local authority supports the delivery of a new community within its area, decisions about its form and design should be managed locally. Removing this to a</p>

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		national decision further removes local democracy from the process.
Q10	Decision making should be faster and use digital technology to establish whether proposals were 'within the rules'. Supporting material for applications should be no more than 50 pages long and technical supporting information should be standardised. There would be standard national planning conditions to cover common issues.	<p>Planning decisions often involve consideration of complex interrelated matters which cannot be dealt with by a consideration of rules. There is a need to weigh up the benefits of a proposal against the harm. Often the detail of any harm can be complex and therefore limiting justification for a proposal to 50 pages and standardising technical information runs the risk of removing the ability for full consideration of issues.</p> <p>Standard national conditions do not necessarily reflect local issues and the preferred local way of addressing them.</p>
Q11	Local plans are to be much shorter, no longer containing long lists of policies but instead a core set of standards and requirements. They are also proposed to be much more visual and map-based, on a standardised template based on the latest digital technology, so that as much as possible can be 'read' by computer, to give an immediate answer as to what development would be allowed, rather than weighing up various policy considerations.	<p>The greater reliance on digital means of communication will potentially disadvantage older people, those in deprived areas and those with certain disabilities.</p> <p>Standardisation of local plans also removes the potential for local innovation and distinctiveness.</p>
Q12	A statutory timetable for local plan preparation is proposed, of no more than 30 months in total, restricting the time over which such community engagement can take place.	<p>This restricted timescale would severely limit the front-loading of community engagement that could take place. Significantly more technical evidence would be needed to support a local plan if its proposals were to be granted automatic outline permission, and this would also be difficult to achieve within the indicated timescale.</p>
Q13	Neighbourhood plans would be retained, but their content may need to become more focused so as to reflect the proposals for local plans, and to become more digitally based	<p>The retention of neighbourhood plans is supported but it would be important to clarify their role in the zoning system proposed for local plans, including whether they would be able to change zoning or whether they would be focused on local design codes. Neighbourhood plan groups would need support in developing more digital approaches.</p>

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Q14	<p>There would be a stronger emphasis on build-out and delivery, and design codes and masterplans should seek to ensure a variety of development types within sites so as to allow more phases to come forward at once.</p>	<p>While the variety of development types within a site is one of the factors that can affect delivery, there are others, including market absorption rates and the reliance on the development sector for infrastructure provision.</p> <p>Delays in house building nationally are not all due to the planning system – local planning authorities do not build houses.</p>
<p><b>PILLAR 2: PLANNING FOR BEAUTIFUL AND SUSTAINABLE PLACES</b></p>		
Q17	<p>This section makes some welcome but very general statements about encouraging climate change mitigation and facilitating improvements in energy efficiency standards through national policy, as well as being more ambitious about place making and the creation of beautiful places.</p> <p>A national design code is in preparation, to be taken into account in all developments, and the preparation of local design codes within or alongside local plans is proposed, as well as masterplanning of development in growth areas, as a condition of their automatic outline planning permission.</p> <p>Local design codes may be developed by the local planning authority, in neighbourhood plans, or by applicants, and should demonstrate empirical evidence of what is popular locally.</p> <p>‘Popular and replicable forms of development’ would be able to be approved easily and quickly.</p>	<p>The increased emphasis on design quality is very welcome: the pressure for more housing without stronger design policies has led to poor placemaking in recent years.</p> <p>Design codes can however be a relatively inflexible means of achieving quality, and masterplanning requires the consideration of a wide range of factors other than appearance – in particular, the practicalities of implementation of development such as the timing of infrastructure provision, mitigation against potential harm such as flooding or harm to protected habitats or heritage interests, are often the matters over which a great deal of time and evidence is required before decisions can be made.</p> <p>Local design codes will be important to ensure that local character and context is reflected in new development, but will require significant resourcing and training, and the preparation of design codes and masterplans, particularly bearing in mind the importance of community engagement in the process, will take time, not necessarily making the system faster as envisaged.</p> <p>Design codes need to include the design and management of greenspace and public realm, not only the design of buildings.</p>
Q20	<p>It is proposed to introduce a ‘fast track for beauty’ to incentivise and accelerate high</p>	<p>It would be important to understand clearly how development would be assessed as</p>

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	quality development which reflects local character and preference	meeting the criteria – presumably this would be linked to the national or local design codes. There is a risk that the use of pattern books or replication of popular designs will reduce local distinctiveness and result in greater homogeneity of developments. A more fundamental concern is that a development that is considered beautiful may not adequately deliver the other elements of place making such as infrastructure delivery or biodiversity mitigation but may qualify for ‘fast track for beauty’.
	The national planning framework for listed buildings and conservation areas will be reviewed and updated, to ensure their significance is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. The government is considering whether suitably experienced architectural specialists should be regarded as having earned autonomy from routine listed building consents.	We agree with the importance of addressing climate change, but it is important to take account of the latest research into the energy efficiency of historic buildings, many of which do have high energy performance which may be harmed by subsequent adaptations. We do not support the concept of certain consultants having exemption from listed building consents: few cases actually are ‘routine’ and it is difficult to retain objectivity without an independent assessment.
<b>PILLAR 3: PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES</b>		
Q22	This section sets out the proposal for a single infrastructure levy to replace the current Community Infrastructure Levy and Section 106 planning agreements. This would mean that affordable housing would be included in the single levy payment rather than being negotiated separately.	The simplification of this system could reduce some of the time and effort of negotiation, but the method of working it out would be critical, in particular in relation to the amount of funding that would be secured. Community Infrastructure Levy payments cover only a fraction of the cost of the total infrastructure required, and affordable housing provided through development is limited by development viability. The new levy payments would continue to be based on development viability, as they are proposed to be based on a proportion of development proceeds above a certain level, so it is likely that they

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		<p>will still not provide sufficient funding for all the infrastructure required.</p> <p>In addition, in areas where development viability was more favourable, a higher levy would be paid. This would result in a disproportionate amount of the levy being collected in some areas but no mechanism is suggested to redistribute this to areas where infrastructure need is greatest or where development is less viable (and consequently levy receipts are lower).</p> <p>Section 106 agreements are used not only for securing funding, but for in-kind provision and land transfers: it is not clear how these would be achieved under the proposed changes. Their purpose is enabling development to come forward that would otherwise be unacceptable.</p>
Q22	<p>A number of alternatives are put forward in the paper, including a standard levy amount across the whole country; a nationally set levy but with local variation within it to take account of differences in development viability between areas; or locally set amounts, which would presumably need to go through a preparation and consultation process similar to that currently carried out for the Community Infrastructure Levy.</p>	<p>Allowing for local variation is important in order to maximise the potential gain from development in the more viable areas and avoid blocking development in the less viable areas, though setting the rates nationally would reduce the burden on local authorities. Many existing development allocations, where land value has already been set, may be unable to accommodate these changes</p>
Q22	<p>Payment of the new levy would be due on occupation of the properties</p>	<p>Contributions payable at the end of the development process may help cashflow but may delay the delivery of important prerequisites.</p> <p>The infrastructure levy must be compliant with the Habitats Regulations where it is being used to provide mitigation for potentially adverse impacts on protected habitats. Payment on occupation of properties is not likely to be sufficient if the harm has taken place at the start of building.</p>
Q23	<p>The new infrastructure levy could be extended to capture changes of use through permitted development rights, including office to residential conversions.</p>	<p>This is supported: it would increase the levy base and mean that office to residential conversions and agricultural conversions were contributing towards affordable housing and</p>

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		infrastructure provision.
Q25	More freedom could be given to local authorities over how they spend the infrastructure levy: for example allowing them to spend receipts on their policy priorities, including improving services or reducing council tax, once core infrastructure obligations have been met.	It is unlikely that authorities will receive more funding than is necessary to provide 'core infrastructure obligations' and there is a risk of separating the infrastructure benefits of development from the communities in which it takes place. It would also be important to ring-fence the funding for affordable housing, to ensure ongoing provision.

## 10. Consultation on changes to the existing planning system

10.1 A separate consultation paper on changes to the existing planning system was published on 6 August, the same day as the publication of the White Paper. This sets out interim proposals for changes to the current planning system, which would take effect before the more significant changes set out in the White Paper.

10.2 The changes include four main proposals:

- Changes to the standard methodology for calculating local housing need. Revised standard housing targets for each council area can be derived from the new methodology set out in the consultation paper. The current methodology uses two inputs, with a baseline of the household forecasts, and an adjustment based on affordability. The new interim targets would use whichever is the higher of 0.5% of existing housing stock, or the projected average annual growth over a ten year period, as the baseline figure. The affordability adjustment would be derived using the current affordability ratio and the change in affordability over the last ten years. These are not the figures that would become binding if the White Paper proposals come in: the White Paper proposes that environmental constraints would also be taken into account which these interim figures do not do. However it is likely that these changes will form part of the methodology for calculating the new binding targets as well;
- Securing 'First Homes' through developer contributions in the short term, prior to the introduction of the new infrastructure levy proposed in the White Paper. It is proposed that a minimum of 25% of all affordable housing units secured through developer contributions should be 'First Homes', which would be discounted

market housing (with discounts of 30% from market value, or more if this can be justified in local plans) aimed at local first time buyers. The discounts would remain on subsequent sales so that they deliver a long term community benefit;

- Supporting small and medium sized builders by temporarily raising the threshold below which developers do not need to contribute towards the provision of affordable housing, to 40 or 50 (compared with the current threshold of 10). This would not apply in designated rural areas such as the Area of Outstanding Natural Beauty where the lower threshold of 5 could still be applied;
- Extending the current 'permission in principle' regime to major development, to enable a faster route to securing the principle of development for housing on sites without having to work up detailed plans first.

- 10.3 The implications of the changes to the standard methodology for housing numbers have been worked out for every local authority in the country, and there are some significant effects nationally as a result of the greater emphasis on the affordability factor – in particular, high demand areas such as London have even higher targets, whereas many areas planning for higher levels of growth – including Cambridge and many council areas in the north of the country – have lower targets.
- 10.4 On first calculation, the standard housing figure for the Dorset Council local plan area would be greater under the changed methodology, rising to 2,075 per annum compared with the current 1,793 per annum. The figure for the adjoining Bournemouth, Christchurch and Poole Council area would however be considerably lower, and this would reduce the potential housing shortfall from adjoining areas that Dorset Council's local plan would otherwise have to consider providing for. This revised methodology, once confirmed following the consultation, would need to be used in the next stages of preparation of the Dorset Council and BCP Council local plans.
- 10.5 The main concerns arising from these interim proposals however are the impacts on affordable housing provision. The temporary raising of the affordable housing thresholds is likely significantly to reduce the amount of affordable housing provided in the Dorset Council area, as a relatively high proportion of housing sites in the area are of the size range of between 10 and 50 homes, though housing sites in the Areas of Outstanding Natural Beauty will be unaffected. It is recognised that this is a temporary measure only, aimed at supporting the economic recovery following the Covid 19 pandemic, but nonetheless the longer term impacts of reduced affordable housing provision are of concern. In addition, while discounted market housing such as First Homes has a role to play in affordable housing provision, in areas like Dorset where affordability ratios

are very high, the discounts may still not be sufficient to make homes affordable to people on average local incomes, and more affordable rented housing is still likely to be a priority.

- 10.6 These concerns have been set out in an officer response to the consultation, which has been included as Appendix 1 to this report.

## **11. Implications for Dorset Council and the local plan**

- 11.1 A new Dorset Council Local Plan is currently in preparation, with a major consultation planned for the new year 2021, submission scheduled for March 2022 and adoption by April 2023. Adoption within this timescale is a high priority for the council, so that we have clear planning policies in place across the whole area and a sufficient supply of land for housing and economic development.
- 11.2 The proposed changes will have significant impacts on the preparation of the local plan. To start with, the new interim housing target will need to be taken into account, and we will need to make sure that our consultation proposals in the new year include sufficient sites to meet those revised targets.
- 11.3 The White Paper sets out highly ambitious timescales for the introduction of the new approach, despite the fact that it requires the introduction of new primary legislation. If the proposals are brought in as set out, then it would be mandatory for a new style local plan, in the national standard digital template, to be adopted by April 2024, having taken no more than 30 months to prepare. This would not enable the Dorset Council Local Plan as currently envisaged to be adopted first. The new style plans are proposed to be very different and there is a risk that the current work on aspects such as local development management policies will be abortive as it would not form part of the new plan. The work, and consultation, on potential development sites, and the evidence being undertaken to support it, would however still be relevant to the decisions that would need to be made in the potential new system. While the consultation on the White Paper is taking place and the results being considered, it is therefore considered appropriate to carry on work on the Dorset Council Local Plan including the first options consultation, but we will need to recognise the likelihood of having to change to preparing a new style local plan before being able to progress further.

### **Footnote:**

Issues relating to financial, legal, environmental, economic and equalities implications have been considered and any information relevant to the decision is included within the report.