

## **Position statement on Dorset Council Local Plan progress - 15 March 2021**

This position statement has been prepared to report to Dorset Council's Scrutiny Committee on the progress with the Dorset Local Plan, as we reach the close of the consultation period. It follows the briefing paper that was circulated to all members prior to the beginning of the consultation. That paper set out a summary of the development proposals and content of the plan, which is not repeated here.

This paper does however consider some of the questions and issues that have been raised during the consultation process, and matters that will need to be considered as we move forward with the plan.

### **Members' involvement to date**

An Executive Advisory Panel was established to steer and support the work on the local plan. This was a cross-party group, chaired by the planning portfolio holder, and met every month during the preparation of the consultation document. Two all-member briefings were held, and a briefing paper summarising the content of the consultation document was sent out to all members before the consultation started. Events for town and parish councils were also held in February and March 2020.

### **Process for preparing the plan**

The plan is still at an early stage of preparation.

Following this consultation, all the responses will be considered, and a more advanced draft plan will be published towards the end of this year. There will be a further opportunity to comment at that stage, but it is a more formal stage and all the comments received at that point will be sent directly to the inspector who will hold the public examination.

The inspector will consider whether the due processes have been followed in preparing the plan, as well as assessing the soundness of the content. Only if the inspector finds the plan sound and legally compliant will it be adopted.

We aim to adopt the plan in spring 2023, following the formal 'publication' at the end of this year, submission for examination in spring 2022, and examination during summer 2022

### **Why making progress is so important**

Without an up to date local plan and supply of land for housing, we have less control over development as we cannot give as much weight to local policies in decisions on applications.

National planning policy, as set out in the National Planning Policy Framework, states that where local planning policies are not up to date, then less weight can be attached to them in decisions on applications, which should instead be determined in accordance with national policy and its 'presumption in favour of sustainable development'. Local policies carry less weight where they are in plans that are more than five years old, where the area does not have the required five-year supply of land available for housing development, or where housing development in the previous year has been insufficient to pass the 'housing delivery test'.

All of our currently adopted local plans are more than five years old, and we do not have enough land allocated for housing to meet current requirements. This means that we are having to apply the 'presumption in favour of sustainable development' and allow some applications that we would otherwise have refused. This will be the case until housing land supply and delivery improve, and it is preferable to achieve this through adopting a new plan deciding where this growth should best be located, rather than by having to continue to allow speculative development proposals. Therefore, it is vitally important for us to avoid any delay in preparing the plan.

The consequential orders at the time of Dorset Council's formation included the requirement for a new Dorset-wide local plan to be adopted by spring 2024, and a ministerial statement has recently been sent to all local planning authorities stressing the need for all to have up to date local plans by the end of 2023.

### **Consultation approach**

Consulting during the pandemic has obviously required changes from previous approaches, as we have been unable to carry out traditional face-to-face events such as exhibitions in village halls. But we have worked hard to provide a range of alternatives. This has included social media advertising, webinars (that can also be accessed via the telephone), podcasts, online surgeries where groups can talk to us directly, and a dedicated telephone line for people who would like to speak to planning officers and discuss anything to do with the plan.

Alongside the online advertising, we have had around 50 articles in the traditional media and an article was sent to all parish and community magazines back in December to publicise the consultation. We have also used posters and displays in high street shops to publicise the plan, and have written to everyone who has previously asked to be kept in touch with local plan preparation. Copies have been available to borrow from local libraries under the 'order and collect' system for those unable to view the documents online. Town and parish councils have also done a great deal to publicise the consultation in their local areas.

This may be a different approach for those who have responded to local plan consultations previously, but we can potentially reach a much wider number of people and different audiences from those normally involved. We have already reached over 2.5 million people on social media and had around 43,500 visits to our web pages. We have had over 5,500 viewings of our webinars, and over 900 listens of our podcasts. Advertising on social media, Spotify and Anchor is helping us to reach younger people, who are normally less likely to be aware of consultations.

An equalities impact assessment on the consultation was carried out beforehand and is available on the website.

We have currently received 32,140 comments, from 6,676 organisations or individuals.

### **Housing numbers**

A number of organisations and individuals have objected to the housing targets included in the plan and have suggested that exceptions be made to the national methodology for setting these targets, because of Dorset's environmental constraints.

National policy as set out in the NPPF 2019 states, in paragraph 60, that 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs

assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing needs figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for’.

This makes quite clear that we should be following the national standard methodology unless there are exceptional reasons not to do so. Deviating from the standard methodology would require justification: following it does not.

We do not currently believe that there are exceptional circumstances to justify taking a different approach from the standard methodology in Dorset. Testing this out through the examination process would mean taking a very high risk of the plan being found unsound, creating significant delay in having an up to date plan.

Objectors have also pointed out that at the time the consultation document was published, no formal requests had been received from neighbouring local authorities asking if Dorset Council could meet some of their unmet housing need. This is because those authorities have not all reached conclusions about how much of their requirement they can meet, but the consultation response from Bournemouth Christchurch and Poole Council identifies that they have a very significant need and will not be able to meet all of it in their area.

We deliberately included a greater housing land supply in the consultation document than was necessary to meet the Dorset Council target. This was for a number of reasons: it was a consultation document only and we may need to take out sites as a result of the comments received; we may need to increase the target to reflect the unmet needs of neighbouring areas when we have more information on those; the national targets may increase; and it is helpful to have a larger supply than necessary in order to provide greater flexibility, to increase our likelihood of meeting the five year housing land supply requirement in future.

### **New settlements**

The consultation document does not identify land for a new settlement in Dorset, but it mentions the fact that alongside work on preparing the local plan, the council intends to investigate the opportunities for new settlements or major development areas. The EAP has supported further work being done on this.

New settlements or major development areas however take a long time between being identified in a plan and starting to deliver homes on the ground. They would not be a substitute for the sort of developments put forward in the consultation paper, as we need to have a constant housing land supply so we need to allocate land that will come forward more quickly. But they would contribute towards the development requirements in the next local plan, and so it is important to start work on this alongside the preparation of this plan.

We will be commissioning further work to invite landowners to propose potential new settlement / major development sites, and to assess their relative merits and requirements, alongside work on this plan.

## **Responding to the consultation, and next steps**

Officers will continue to work with the EAP to consider the consultation responses and the changes we need to make as a result.

We are also commissioning further evidence work. Some of this, such as viability evidence, needs to be as up to date as possible at the time of the examination, which is why it has not been undertaken earlier. And some further work may need to be commissioned as a result of issues raised in the consultation.

We plan to hold a briefing session for all members in a couple of months' time when officers have read all the comments and can report back on the issues raised.

Members will be asked to approve the 'publication' version of the plan in the autumn. That will be the version of the plan that the council submits for public examination, after it has been published for a six-week statutory period for people to comment on it. All the comments at that more formal stage will be sent to the inspector who will hold the public examination.

The inspector, if we ask them to, will recommend changes, or modifications, that are necessary to make the plan sound. These will all be published for a further round of consultation before the inspector's report is finalised. The modifications proposed in the inspector's report must be made to the plan, as it can only be adopted if it is found sound.