

Appendix 1 – Response to the request from BCP Council to consider helping to meet housing need in the Dorset Council area

Dear Ms Lane,

On 11 June 2024, Dorset Council received a request from BCP Council to consider whether Dorset Council could assist in meeting the unmet need for housing that was not being met through the BCP Council Local Plan. The unmet need is considered significant at more than 15,000 new homes over the period to 2039 and this would have potentially far-reaching implications for Dorset Council. This response has therefore been considered and agreed by Dorset Council's Cabinet.

It is understood that through the application of the Government's Standard Method for calculating local plan housing targets, the Local Housing Need (LHN) for BCP Council is 2,806 new homes per annum. This is equivalent to just over 40,000 new homes over the 15-year plan period. The equivalent figures for Dorset Council are 1,793 new homes per annum or around 26,900 homes over the 15-year plan period.

The jointly prepared Review of Housing Need, published in December 2021 examined the components of this housing target specifically the 2014-based household projections. The review concluded that average net in-migration to the BCP area was considerably lower than that projected through the 2014-based household projections which would lead to a lower LHN figure. The revised projections from this study suggests a LHN figure of around 1,600 new homes per annum for BCP Council, equivalent to around 24,000 homes over the plan period. Despite this locally produced evidence, national policy states that the LHN figures calculated using the Standard Method, should be the advisory starting point for establishing the housing target for an area. In addition to the LHN, 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 in the local plan.

It is within this context that Dorset Council needed to consider the unmet need request from BCP Council. In responding to the unmet need request, Dorset Council have examined the policies for managing housing supply in the submitted Local Plan alongside the evidence that supports this supply.

Dorset Council supports the efforts within the BCP Local Plan to focus the delivery of housing on urban intensification within the existing built-up areas. Approximately 90% of the new housing being proposed is within the existing urban areas with the remaining 10% being delivered at the three existing strategic urban extensions. It is however concerning that there are no proposals within the BCP Council Local Plan to release development sites from the Green Belt despite the shortfall in identified supply.

The BCP Local Plan refers to a historic delivery rate of 1,117 dwellings per year over the last 15 years, a rate below that proposed in the Local Plan. Therefore, in order to achieve the proposed delivery rates, a change in the policy framework is likely to be necessary.

Opportunities within the BCP built-up area

The policies in the Local Plan seek to manage development within the plan area to minimise any harm that may arise from the levels of development proposed and Dorset Council supports this approach. However, these policies need to be applied as guidelines so that innovative approaches at higher densities are not prevented.

The summary of Capacity Testing for Key Sites (HOM13) prepared as evidence for the BCP Local Plan assessed a limited number of sites by applying urban design principles alongside site specific constraints. Dorset Council have reviewed the sites in this assessment and concluded that with modest adjustments to site design, height or layout a significant number of additional homes could be delivered. Therefore by increasing the densities in appropriate locations in BCP (e.g. by adding an additional storey to a building), an increase in supply could be achieved with minimal impact, and this would be preferable to displacing the need out to the Dorset Council area.

It is unclear whether an up-to-date review of the need for open space, sports facilities and play areas has been completed. This type of assessment could identify areas that are surplus to requirements and that could be released to help meet housing need. If this work has not been complete, Dorset Council suggest that it is undertaken to support BCP in efforts to meet its housing need.

Opportunities within the Green Belt

National policy makes provision for Green Belt to be released through the plan-making process where exceptional circumstances exist. To demonstrate that exceptional circumstances exist, all other reasonable options to meeting housing need should be examined. This includes a strategy for making use of brownfield land and optimising density, specifically promoting a significant uplift in density. National policy also suggests that decisions to release Green Belt land for development should be informed by discussions with neighbouring authorities and when reviewing these boundaries, the need to promote sustainable patterns of development should be taken into account. Sites submitted to BCP Council within the Green Belt have the potential to deliver significant additional growth.

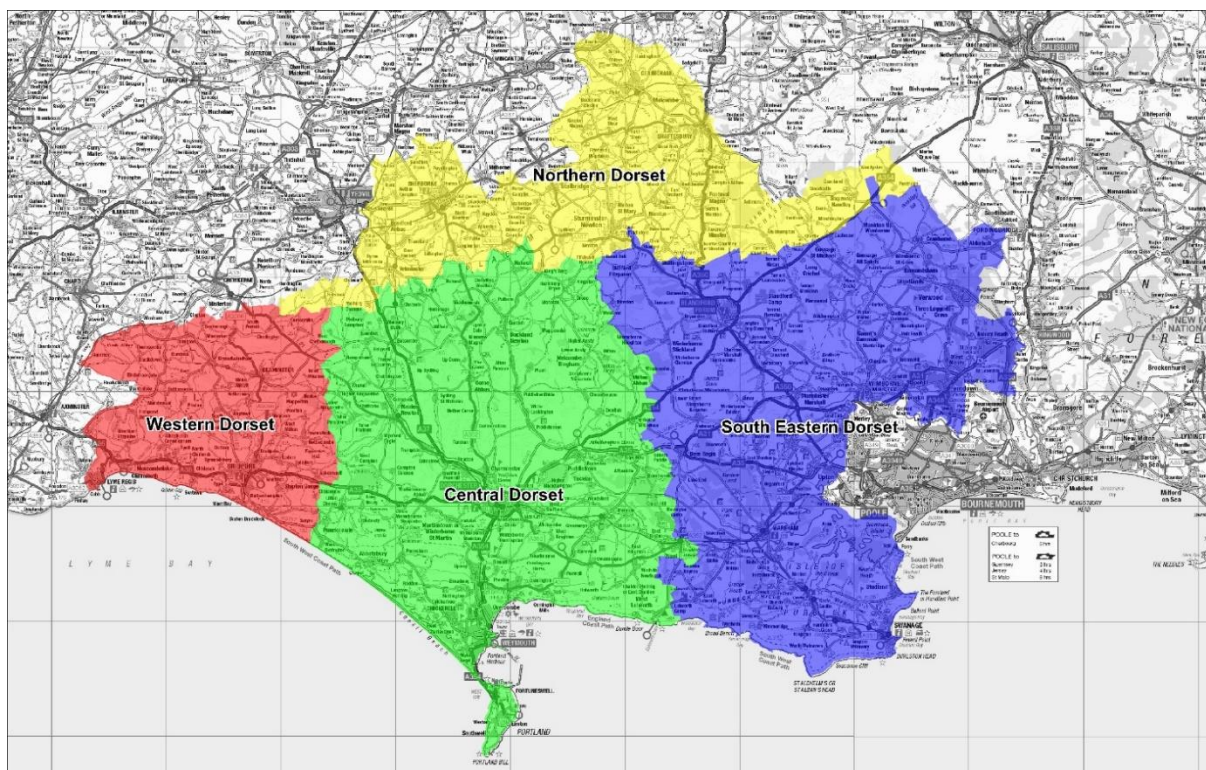
Dorset Council's interpretation of this national Green Belt policy is that opportunities for maximising delivery within the existing urban area should be explored first. Once this has been undertaken, options within the Green Belt should be considered with the aim of delivering sustainable patterns of development. This would suggest a consideration of constraints but would also include a presumption that housing should be delivered close to the origin of the need rather than being displaced to more remote areas. A strategic review of options for Green Belt release should be undertaken independently of the two councils to recommend options for delivering additional housing. It is unreasonable and unsustainable

to expect Dorset Council to release sites within their part of the Green Belt to make up for the deficit arising from the BCP Council area if BCP Council are not releasing sites within their part of the Green Belt.

Opportunities within Dorset area, outside the Green Belt

To inform the Dorset Council Local Plan, a review of housing market and functional economic areas at the local scale has been undertaken. This concluded that there are four broad functional areas in Dorset¹ and it is clear from this work that parts of the Dorset Council area, the South Eastern Dorset Functional Area, are closely linked to the BCP area. However, there are limits to these linkages, with the influence of the BCP conurbation reducing further away from the shared boundary. It would be inappropriate to consider meeting any need that originates from within the BCP Council area in the western or northern extremes of Dorset.

Figure 1: Functional areas in Dorset



Within each of the four functional areas, Dorset Council has identified the most appropriate settlements for growth based on an assessment of their relative sustainability. At these locations, development can be supported by or help enhance existing infrastructure provision. The most suitable settlements are the main towns (including parts of the southeast Dorset conurbation that cross into the Dorset Council area) where the Dorset Council Local Plan will seek to focus most growth. Alongside these towns, a number of larger villages were identified as being appropriate for lower levels of growth, primarily to meet local needs.

¹ <https://www.dorsetcouncil.gov.uk/documents/35024/290430/DCLP-Jan-2021-Functional+Areas.pdf/24d4ddde-1df9-56f5-c708-9b38397f756f>

Consultation on the emerging Dorset Council Local Plan (January 2021) identified potential development opportunities sufficient to meet the LHN for Dorset at the main towns across the plan area. This included potential sites for Green Belt release. Since this work was undertaken, Dorset Council has adopted the Purbeck Local Plan which included release of Green Belt to enable the delivery of new homes.

Opportunities for delivering additional growth beyond that identified within the draft Dorset Council Local Plan (January 2021) within the Green Belt are yet to be explored in detail but are likely to be limited in scale due to the highly sensitive environment in this area.

Looking beyond the Green Belt would displace development further away from the origin of the need and in many instances, into the National Landscapes that cover much of Dorset. This approach would not be appropriate as significant development within the National Landscapes would be contrary to national policy. There are also multiple other designations² that would significantly restrict the capacity for additional growth.

Conclusions and Recommendations

Dorset Council does not consider that it would be appropriate to meet the unmet housing need that BCP Council has requested without a full examination of the opportunities within the BCP area.

It is recommended that BCP Council undertake a review of their supply in the light of the suggestions and opportunities identified by Dorset Council before concluding that the LHN cannot be met within the BCP Council area. It is also recommended that BCP Council engage in a full and thorough review of the Green Belt alongside Dorset Council to identify those areas most suitable for release with the aim of meeting housing need in the most sustainable locations.

Since submission of the BCP Council Local Plan, the Government have released a revised NPPF for consultation. This response does not reflect the detail of these changes, but many will be relevant. Changes include a revised Standard Method for calculating LHN and proposals around the review of Green Belt. These were detailed in the Written Ministerial Statement that accompanied the consultation and therefore will have a bearing on the progression of the BCP Council Local Plan through the examination process. It is likely that the Dorset Council Local Plan will have to reflect these changes to national policy and therefore will need to aim to meet a significantly higher housing target than the current LHN further reducing the capacity for Dorset Council to meet the unmet housing need from BCP Council.

² Including those listed in Footnote 7 of the NPPF.