



# **Dorset Council**

# Annual position statement – 5 year housing land supply

October 2024

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The following appendices are published separately to this report:

• Appendices A to G: Sites within the five year supply, October 2024

# 2. Acronyms

APS	Annual Position Statement
CIL	Community Infrastructure Levy
MHCLG	Ministry of Housing, Communities and Local Government
DPD	Development Plan Documents
ED	East Dorset
HDT	Housing Delivery Test
LHN	Local Housing Needs
LPA	Local Planning Authority
LNMF	Local Nutrient Mitigation Fund
LURA	Levelling Up and Regeneration Act
ND	North Dorset
NPPF	National Planning Policy Framework
PINS	Planning Inspectorate
PPG	Planning Policy Guidance
SHLAA	Strategic Housing Land Availability Assessment
WDWP	West Dorset, Weymouth and Portland

## 3. Summary

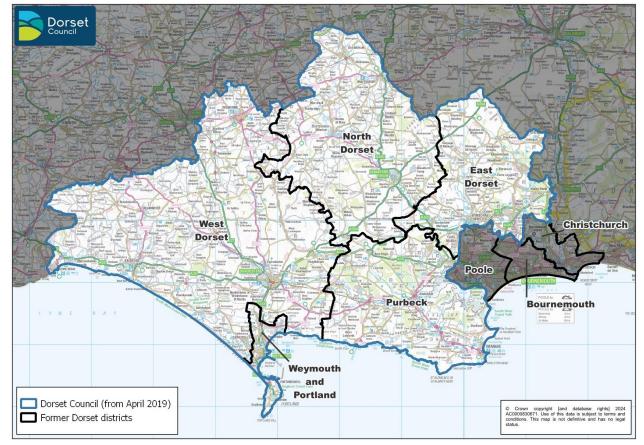
- 3.1. This Annual Position Statement (APS) sets out the housing land supply position for Dorset Council for the base date 1 April 2024. Dorset Council covers the former districts/boroughs of East Dorset, North Dorset, Purbeck, West Dorset and Weymouth and Portland. On the 1 April 2024, the adopted Local Plans covering these former local authority areas were more than 5 years old. However, a new Purbeck Local Plan was going through the examination process at this time and was subsequently adopted on 18 July 2024.
- 3.2. As set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), when an adopted Local Plan is more than 5 years old, the housing requirement is the local housing need figure calculated using the standard methodology set out in PPG. However, if a Local Plan is recently adopted, this housing needs figure should be used instead. The latest local housing need figure for the Dorset Council area is calculated to be 1,793 dwellings per annum for 1<sup>st</sup> April 2024.
- 3.3. Dorset Council can demonstrate a deliverable housing supply of 8,999 dwellings for the 2024-2029 period. Dorset Council is therefore able to demonstrate a deliverable housing land supply of 5.02 years.
- 3.4. This deliverable housing supply takes into account the advice from Natural England first issued in March 2022 along with subsequent announcements highlighting the need for nutrient neutrality for all new developments within the Chesil and the Fleet, Avon, the Poole Harbour, Somerset Levels and Moors, and Axe catchments.

## 4. Introduction

- 4.1. In December 2023 the Government issued an updated NPPF. The NPPF requires Local Planning Authorities (LPAs) to identify and update annually their supply of deliverable housing sites. In order to do this, LPAs can prepare an annual position statement (APS), which is produced through engagement with developers and other stakeholders and is considered by the Planning Inspectorate (on behalf of the Secretary of State).
- 4.2. This APS has been informed by:
  - stakeholder engagement that took place in June-July 2024,
  - direct engagement with landowners and agents that took place in April May 2024,
  - a review of planning history and building control records, and
  - residential site monitoring work.
- 4.3. A draft version of the APS was submitted to the Planning Inspectorate (PINS) prior to the 31 July. PINS reviewed the APS and assessed:
  - if the correct procedure had been followed in line with the planning practice guidance on housing supply and delivery, and
  - whether both sufficient information has been provided and engagement had taken place to justify a site's inclusion in the five-year housing land supply schedule.
- 4.4. PINS issued a recommendation on 26 September 2024 and confirmed that Dorset Council can demonstrate a housing land supply position of 5.02 years, and that this position is now confirmed until 31 October 2025.

## 5. Dorset's History

5.1. Whilst work is being progressed on a new Local Plan for Dorset, the adopted Local Plans will continue to apply in the areas they cover. They will continue to be used for decision making purposes until they are replaced.



Map 1.1 The Dorset Council area and the pre-April 2019 council areas

## **Adopted Local Plans**

- 5.2. On 1<sup>st</sup> April 2024, the adopted local plans (development plan documents) in the Dorset Council area were:
  - Christchurch and East Dorset Local Plan Part 1: Core Strategy (2014) plus saved policies from the East Dorset Local Plan (2002)
  - North Dorset Local Plan Part 1 (2016) plus saved policies from the North Dorset Local Plan (2003)
  - Purbeck Local Plan Part 1 (2012)

- Swanage Local Plan (2017)
- West Dorset, Weymouth and Portland Local Plan (2015)
- Bournemouth, Dorset and Poole Minerals Strategy (2014)
- Bournemouth, Christchurch, Poole and Dorset Minerals Sites Plan (2019)
- Bournemouth, Christchurch, Poole and Dorset Waste Plan (2019)
- 5.3. The existing Local Plans can be viewed here: <u>www.dorsetcouncil.gov.uk/adopted-local-plans</u>.
- 5.4. The new Purbeck Local Plan (2018 to 2034) was adopted on 18 July 2024. From that date, it replaces the Purbeck Local Plan Part 1 (2012).

## **Emerging Local Plans**

5.5. Dorset Council is progressing with the development of a Dorset Council Local Plan, which, once adopted, will replace all the adopted Local Plans in the Dorset Council area. Information on the process for producing the Dorset Council Local Plan can be found in the Local Development Scheme, available from <u>www.dorsetcouncil.gov.uk/dorset-</u> <u>council-local-plan</u>

## Reason for change to a single Dorset Housing Land Supply Position Statement

- 5.6. The Council previously published housing land supply position statements for the legacy authorities because the adopted Local Plan housing targets were all less than five years old when Dorset Council was formed. There are provisions within the PPG for legacy authority areas to be used until the polices in the plans are superseded or are five years old.
- 5.7. On the 1<sup>st</sup> April 2024, the adopted Local Plans for North Dorset, Christchurch and East Dorset, Purbeck, and West Dorset, Weymouth and Portland were more than 5 years old. As noted above, a new replacement Purbeck Local Plan has been adopted, but it was not adopted on its base date in 2018.
- 5.8. It is considered that for 1<sup>st</sup> April 2024 (the fifth anniversary of when Dorset Council came into existence), it is appropriate to move to a single Dorset Council housing land supply calculation. This will assist with production of the Dorset Council Local Plan and provide a more consistent approach across the area. It also helps with the process of confirming

the Dorset Council housing land supply position through the production of a single annual position statement.

## 6. Housing sites constraints: sites affected by nutrient neutrality

## Advice from Natural England

- 6.1. Natural England issued advice on 16 March 2022. This identified a number of protected freshwater or estuarine habitats that are in unfavourable condition. New developments within one of these catchments should be nutrient neutral. This means there should be no net increase in nutrients entering the protected habitat sites arising from development via both wastewater and surface water flows.
- 6.2. Within Dorset, there are five catchments that are affected by the nutrient neutrality requirement. These are:
  - Poole Harbour: sensitive to both phosphorus and nitrogen
  - Chesil & The Fleet: sensitive to both phosphorus and nitrogen
  - River Axe: sensitive to phosphorus
  - River Avon: sensitive to phosphorus
  - Somerset Levels & Moors: sensitive to phosphorus
- 6.3. Since this advice was issued, the Government has put in place measures to help to unblock housing sites, which include:
  - Wastewater treatment works serving 2,000+ people are required to be upgraded to reduce the nutrient flow from wastewater (required by the Levelling Up and Regeneration Act 2023 LURA). The LURA also included provisions for the Secretary of State to nominate additional wastewater treatment works for upgrade.
  - A nutrient mitigation scheme managed by Natural England to deliver nutrient mitigation within the affected catchments.
  - A Local Nutrient Mitigation Fund (LNMF) to enable Local Planning Authorities to develop local mitigation strategies to deliver mitigation for development. Dorset Council has been awarded funds from the LNMF to deliver nutrient mitigation within the Poole Harbour catchment. Similar awards have been made to Wiltshire Council for the River Avon catchment and Somerset Council for the Somerset Levels and Moors catchment.

#### Working towards a solution

6.4. Dorset Council is taking a different approach in each of the five catchments that affect Dorset. This is due to the nature of the catchments and the different working

arrangements with neighbouring local authorities that share the catchment areas. In all catchments, a market-based approach will be taken forward with options for developments to either deliver their own mitigation, to secure mitigation from a third party or, to secure mitigation from one of the Local Planning Authority schemes.

- 6.5. Within the Poole Harbour catchment, the list of wastewater treatment works that are required to be upgraded through the provisions of LURA includes additional upgrades for phosphorus at seven smaller wastewater treatment works by 1 April 2035. This is in addition to the required upgrades for phosphorus and nitrogen at all works serving a population equivalent above 2,000 in the catchment by 1 April 2030.
- 6.6. On 24 May 2024, a letter was received from Natural England confirming their revised position for the catchment. The letter stated:

"Natural England's assessment is that this [the expanded list of wastewater treatment works upgrades] will deliver the reduction in phosphorus levels required to achieve the conservation objectives of the site, with headroom for new development. It is therefore Natural England's view that the upgrades provide a legally binding solution to restore sustainable phosphorus levels in the Poole Harbour Special Protection Area/Ramsar site".

- 6.7. This means that applications for developments within the Poole Harbour catchment now only need to demonstrate nutrient neutrality for nitrogen. The existing Nitrogen Reduction in Poole Harbour Supplementary Planning Document addresses the delivery of nitrogen mitigation with funding being taken primarily from CIL except in the former North Dorset District area where S.106 agreements are used to secure mitigation. The delivery of mitigation will continue through the use of the LNMF awarded to Dorset Council. In addition, Natural England's Nutrient Mitigation Scheme has secured a significant nutrient mitigation project equivalent to the nutrient loading from around 3,700 new homes.
- 6.8. In the River Avon catchment, there are some mitigation projects that are providing phosphorus mitigation. With the award to Wiltshire Council through the LNMF, mitigation projects will be identified and implemented to provide sufficient mitigation for future development. Dorset Council has agreements in place to enable sufficient mitigation to be provided for developments within the Dorset Council area.
- 6.9. Similarly, in the Somerset Levels & Moors catchment, there are mitigation projects being delivered that are providing phosphorus mitigation for developments within the Dorset Council part of the catchment. Somerset Council are looking to continue to deliver phosphorus mitigation through the use of the LNMF award and Dorset Council has

agreements in place to enable sufficient mitigation to be provided for developments within the Dorset Council area.

- 6.10. For the River Axe catchment, a bid to the Local Nutrient Mitigation Fund has been put together by East Devon District Council with the support of Dorset Council and Somerset Council. This will enable mitigation projects to be delivered within the River Axe catchment with the aim of enabling development to take place.
- 6.11. The Chesil & The Fleet catchment is not eligible to bid to the LNMF due to the low levels of development that are expected within the catchment. Instead, Dorset Council will be working with partners to identify and deliver opportunities for delivering mitigation in this and other catchments.

## 7. Engagement on the draft Annual Position Statement May 2024

- 7.1. Targeted stakeholder engagement on a draft Annual Position Statement (June 2024) took place between 6 June to 4 July 2024. This was aimed at the development industry, landowners, key consultees, and infrastructure providers. Further information on the engagement process and its outcomes can be found in the SD03: Statement of Engagement submitted alongside the draft Annual Position Statement in July 2024.
- 7.2. The draft Annual Position Statement (June 2024) identified a deliverable housing supply of 9,573 dwellings between 2024-2029, equating to a supply position of 5.34 years. As a result of the targeted engagement exercise, the draft APS submitted to PINS suggested that the housing land supply equated to 5.24 years (or 5.32 years if PINS included an additional site: land north and east of the Blandford Bypass, Blandford Forum).

## 8. Housing land supply calculations

- 8.1. National policy requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their Local Housing Need (LHN) where the strategic policies are more than 5 years old.
- 8.2. On the base date (1 April 2024), the adopted Local Plans that cover the Dorset Council area were more than 5 years old, and therefore the Local Housing Need has been calculated using the Standard Method<sup>1</sup>. As discussed, the new Purbeck Local Plan was adopted on 18 July 2024. The Council therefore have also undertaken a second set of calculations to understand the implications of using the housing requirement figure from the recently adopted Purbeck Local Plan.

## **Standard Methodology**

- 8.3. The standard methodology for calculating the LHN for an area starts with the projected growth in households within that area adjusted to take into account local housing affordability, as follows:
  - Step 1 sets the baseline using the 2014-based household projections,
  - Step 2 adjusts this baseline through the application of affordability ratio, and
  - Step 3 allows for the resultant housing target to be capped.
  - An additional **Step 4** applies an uplift to the top 20 cities and urban areas across the country. This step is not applicable to Dorset.

The data used to calculate the LHN has a base date of 1 April 2024 and therefore the household projections and the affordability ratios were those available at this base date.

## Step 1 – Setting the baseline – Dorset wide

8.4. The 2014-based household projections are used to calculate the average household growth over the 10-year period from the base date for when the calculation is being undertaken. The base date for this report is 1 April 2024 and therefore the calculation of

<sup>&</sup>lt;sup>1</sup> Ref: Para 61 & 62 of the NPPF, Para 004 of the PPG Housing and Economic Needs Assessment, ID 2a-004-20201216.

local housing need uses the 10-year period from 2024 to 2034. Over this period, the projected growth in households for the Dorset Council area is as shown in Figure 7.1.

Figure 7.1: 2014-based household projections for Dorset for 2024 and 2034<sup>2</sup>

	2024	2034	Difference
Dorset Total	176,124	188,941	+12,807

8.5. Figure 7.1 shows that in the 10-year period 2024 to 2034, the overall number of households in Dorset is set to grow by 12,807. This is equivalent to average annual increase of 1,280.7 households per annum.

## Step 2 – Applying the affordability adjustment – Dorset wide

8.6. The local affordability ratio is a measure of the affordability of homes in an area. It is calculated as the ratio between median house prices and median workplace-based earnings. Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure.<sup>3</sup> If delivery has been below demand, the relative market price will reflect this, and the affordability ratio will be higher.

Figure 7.2: Median house price, median workplace-based earnings, and ratio between the two for Dorset (data downloaded from ONS 17/5/2024)

Median house price (Sept 2023)	Median workplace-based earnings (2023)	Affordability ratio
£353,000	£32,001	11.03

8.7. The baseline annual projected household growth figure is adjusted to reflect the affordability of housing in the area. This adjustment is based on the most recent median workplace-based local affordability ratios. For Dorset Council, the affordability ratio released in 2024 is 11.03 and this figure has been used to calculate the affordability adjustment factor.

<sup>&</sup>lt;sup>2</sup> Ref: 2014-based household projection available from <u>https://www.gov.uk/government/collections/household-projections</u>. Please note, that the published figures relate to the former districts (East Dorset, North Dorset, West Dorset, Weymouth & Portland and Purbeck). These have been aggregated to create a Dorset total.

<sup>&</sup>lt;sup>3</sup> Ref: Para 031 of the PPG Housing Supply and Delivery, ID: 68-031-20190722.

8.8. The adjustment factor is calculated on the following basis:

$$Adjustment\ factor = \left(\frac{Local\ affordability\ ratio\ -4}{4}\right)x\ 0.25 + 1$$

8.9. For the Dorset Council area, the median workplace-based local affordability ratio gives an adjustment factor of 1.44. When applied to the output from Step 1, uncapped housing need figure of 1,844 dwellings per annum:

## Step 3 – Capping the increase – Dorset wide

- 8.10. Where the strategic policies in a Local Plan were adopted more than 5 years ago (at the point of making the calculation), the housing figure is capped at 40% above the lowest of either the average projected household growth over a 10-year period or the most recently adopted housing target in a Local Plan. The reason for the cap is to ensure that the LHN figure is as deliverable as possible and not significantly above the housing target currently being planned for.
- 8.11. As Dorset does not have an adopted strategic housing requirement, the cap would be calculated by adding 40% to the projected household growth figure established through Step 1:

8.12. As the figure from Step 2 is higher than the cap, this suggests that the local housing need figure should be capped to 1,793 dwellings per annum.

#### Step 4 - Cities and urban centres uplift - Dorset wide

8.13. The final adjustment made as part of the standard methodology is to apply an uplift of 35% to those local authority areas that fall within the top 20 cities and urban areas list published by the Office for National Statistics. Dorset Council does not fall within this list and therefore the uplift is not applied.

#### Local Housing Need – Dorset wide

8.14. The four steps used in the calculation of the LHN figure for the Dorset Council area are outlined above. These calculations indicate that the LHN requirement at 1<sup>st</sup> April 2024 is 1,793 dwellings per annum (dpa).

## Local Housing Need – alternative method using Purbeck Local Plan (2024) housing requirement figure

- 8.15. As mentioned above, the new Purbeck Local Plan was adopted in July 2024, after the base date for this APS. Policy H1 of the Purbeck Local Plan sets a housing requirement for the Purbeck area of 2,976 for the period 2018 to 2034, equivalent to 186 dpa. To allow for this housing requirement figure, the standard method has been used to calculate the local housing needs for each of the former district council areas excluding Purbeck. The total from this calculation has then been added to the newly adopted Purbeck Local Plan housing requirement in order to calculate an alternative Dorset-wide total.
- 8.16. The household projections, used for Step 1, are set out in the table below (excluding Purbeck).

	2024	2034	Difference	Annual change in households
East Dorset	40,928	44,178	+3,250	325.0
North Dorset	32,541	35,089	+2,548	254.8
West Dorset	49,137	52,972	+3,835	383.5
Weymouth & Portland	30,422	32,311	+1,889	188.9

Figure 7.3: Step 1: 2014-based household projections for Dorset – excluding Purbeck

8.17. For Step 2, separate affordability ratios for 2023 for each of the former districts are used, as set out in the table below.<sup>4</sup> The final column applies the affordability adjustment factor to the values from Step 1 and shows the uncapped local housing need figure for each former district (except Purbeck).

<sup>&</sup>lt;sup>4</sup> Ref: Published by ONS. Please use the following link to access this information:

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasede arningsforformerlocalauthorities

	Annual change in households	Affordability ratio	Adjustment factor	Housing need (uncapped)
East Dorset	325.0	12.80	1.55	503.75
North Dorset	254.8	10.87	1.43	364.20
West Dorset	383.5	11.32	1.46	558.95
Weymouth & Portland	188.9	9.36	1.34	252.18

Figure 7.4: Step 2, using the 2023 affordability ratios to adjust the household figures

8.18. The table below shows Step 3, calculating and applying the cap. The capped local housing need figure is no more than 40% above the figures calculated in Step 1.

	Step 1: Annual change in households	Step 1 +40%	Step 2: Housing need (uncapped)	Step 3: Housing need (with caps)
East Dorset	325.0	455.00	503.75	455.00
North Dorset	254.8	356.72	364.20	356.72
West Dorset	383.5	536.90	558.95	536.90
Weymouth & Portland	188.9	264.46	252.18	252.18
Dorset totals, excl. Purbeck	1152.2	1613.08	1679.08	1600.8

Figure 7.5: Step 3, applying the cap to local housing need figures from Step 2

8.19. As discussed above, Step 4 is not relevant to Dorset. Step 3 in the table above therefore provides the final capped standard method figure for Dorset (excluding Purbeck). The total figure is 1600.8, which can be rounded to 1601 dwellings per annum (dpa). The Purbeck Local Plan housing requirement figure (186) is then added to this figure to calculate a Dorset-wide total:

#### 1601 + 186 = 1,787 dpa

- 8.20. Using this method, the Council finds that the Dorset-wide figure decreases from 1,793 dpa (using just the standard method) to 1,787 dpa (using a combination of the standard method and the Purbeck Local Plan housing requirement figure). This is a decrease of 6 dwellings a year, or 30 dwellings over the next 5-year period. The difference in the final figure produced by these two methods is, therefore, considered to be minimal. This is perhaps not surprising given that the housing requirement figure in the Purbeck Local Plan was itself calculated using the standard method.
- 8.21. As discussed above, the Purbeck Local Plan was not adopted on the base date of this APS, and therefore Dorset Council is of the view that the standard method figure of Dorset (1,793 dpa) should be used for the purposes of calculating supply in this APS.

## **Housing Delivery Test**

- 8.22. The Housing Delivery Test (HDT) assesses the delivery of homes over the previous three financial years against the housing requirement for the area. The government publishes a rulebook on how to calculate the HDT.<sup>5</sup>
- 8.23. The net number of new homes delivered in the Dorset Council area has been gathered through annual site visits where the number of newly built homes is counted. This information is submitted annually to Ministry of Housing, Communities and Local Government (MHCLG<sup>6</sup>) who publish the data as live tables on Housing Supply.<sup>7</sup>
- 8.24. In addition to the delivery of new homes, an allowance is made within the HDT for increases in communal accommodation based on the number of bed spaces delivered. In line with the Housing Delivery Test Measurement Rule Book 'student only accommodation' is counted at 2.5 persons per household whilst a ratio of 1.8 is applied to 'other communal accommodation'. This is based on the national average datasets for these types of communal accommodation.
- 8.25. Where delivery as measured by the HDT falls below the planned rate, paragraph 79 of NPPF states that the following penalties apply:
  - Where delivery is below 95% of the planned rate, an action plan should be published setting out the actions being taken to increase delivery.

<sup>&</sup>lt;sup>5</sup> Ref: <u>https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book</u>

<sup>&</sup>lt;sup>6</sup> Ref: Formerly the Department for Levelling Up Housing and Communities (DLUHC)

<sup>&</sup>lt;sup>7</sup> Ref: <u>https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing</u>

- Where delivery falls below 85% of the planned rate, a 20% buffer should be added to the housing land supply to ensure a realistic prospect of delivery against the housing requirement and an action plan should be published.
- Where delivery falls below 75% of the planned rate, the presumption in favour of sustainable development will apply, a 20% buffer should be applied, and an action plan should be published.
- 8.26. The NPPF states that the HDT results apply the day following their publication and that they continue to apply until new HDT results are published. In December 2023, the Government published HDT results for 2022, which are measured over the years 2019/20, 2020/21 and 2021/22. The results for the Dorset Council area are in the table below.

Area	Total number of homes required (2019-2022)	Total number of homes delivered (2019-2022)	Housing Delivery Test: 2022 measurement
Christchurch and East Dorset	2,065	1,851	90%
West Dorset and Weymouth & Portland	2,021	2,293	113%
North Dorset	797	595	75%
Purbeck	464	430	93%
Total (Dorset Council area + Christchurch)	5,347	5,169	97%

Figure 7.6: HDT results for 2022 for the Dorset Council area (source: MHCLG)

8.27. The total figure in the final row have not been published by MHCLG but are derived from the figures published for the adopted Local Plan areas. This is an attempt to calculate an appropriate figure for the Dorset Council area, but it also includes former district of Christchurch, which does not form part of the Dorset Council area. The HDT results for East Dorset and Christchurch are combined because the Christchurch and East Dorset Local Plan Part 1: Core Strategy (2014) was a joint Local Plan which provides a single housing requirement figure for Christchurch and East Dorset which are now split between BCP Council and Dorset Council respectively. This figure cannot be disaggregated.

8.28. While the combined HDT result of **97%** suggests good performance, and places Dorset Council above the various penalties outlined in the NPPF, it would be informative to consider what the result would be when considering the Dorset Council position excluding Christchurch. Dorset Council estimates that the HDT results for the Dorset Council area (excluding Christchurch) would be **102%** for 2022 and **106%** for 2023. Details of these calculations are set out in Appendix H. This confirms that recent performance of housing delivery across the Dorset Council area has been healthy, and above the thresholds set out in NPPF.

## New homes required

- 8.29. The calculations of the five-year requirement for the period 2024 to 2029 are shown in the table below. As set out in Para 014 the NPPG<sup>8</sup>, no allowance has been made for any shortfall against adopted Local Plan targets as the Local Housing Need Figure has been used to derive the housing target for the area.
- 8.30. Dorset Council has used the housing target and five-year supply requirement calculated using the standard method across the whole of Dorset in calculating the housing land supply position in this APS.

Component	Standard method	Standard method + Purbeck LP (2024)
Annual Housing Need	1,793	1,787
Shortfall in delivery against target	o	0
Multiplied by the 5-year period (2024-2029)	8,965	8,935
Housing Delivery Test addition	o	0
Total 5-year requirement	8,965	8,935

Figure 7.7: Five-year requirement (1<sup>st</sup> April 2024 to 31 March 2029)

<sup>&</sup>lt;sup>8</sup> Ref: Para 014 of the NPPG Housing Supply and Delivery, ID: 68-014-20190722.

## 9. Five- year housing land supply

9.1. The NPPF glossary provides a definition of a **'deliverable'** site for the purpose of demonstrating a 5-year supply:

**"Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".

- 9.2. As well as sites which are considered to be deliverable in principle, the PPG<sup>9</sup> further adds to this definition and explains which sites would require further evidence to be considered deliverable, namely those which:
  - Have outline planning permission for major development,
  - Are allocated in a development plan,
  - Have a grant of permission in principle, or
  - Are identified on a brownfield registered.
- 9.3. Such evidence to demonstrate deliverability may include:
  - Current planning status: for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning permission agreement that sets out the timescales for approval of reserved matters applications and discharge of conditions,

<sup>&</sup>lt;sup>9</sup> Ref: Paragraph 007 of the PPG Housing Supply and Delivery, ID: 68-007-20190722.

- Firm progress being made towards the submission of an application for example, a written agreement between the LPA and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates, or
- Clear relevant information about site viability, ownership constraints or infrastructure provision, such as a successful participation in bids for large-scale infrastructure funding or other similar projects.

## Types of sites within Dorset's 5-year housing land supply

- 9.4. Potential sources of housing supply considered to be deliverable within five years include:
  - Minor sites (1 to 9 dwellings) that benefit from planning permission;
  - Major sites (10+ dwellings) that benefit from full planning permission (including reserved matters;
  - Major sites (10+ dwellings) that benefit from outline planning permission;
  - Sites allocated in an adopted Local Plan;
  - Sites allocated in a made neighbourhood plan;
  - Specific large sites (10+ dwellings) identified as having development potential (e.g. through the SHLAA or the brownfield register);
  - Minor sites windfall allowance; and
  - Rural exception sites.
- 9.5. For each of these site categories, different criteria have been used to estimate delivery within 5 years and therefore the contribution towards the 5-year supply.
- 9.6. Several appeals have examined the evidence needed to support the deliverability of a site. The appeal decision for Land South of Westleaze, Charminster (Appeal Reference: APP/D1265/W/18/3206269) clarified the evidence needed to demonstrate deliverability of a site and the conclusions from this decision have been incorporated into the evaluation of the supply. In addition, the called in appeal at Land to the East of Newport Road and to the East and West of Cranfield Road (Appeal Reference: APP/Y0435/W/17/3169314) has supported the view that evidence obtained after the 5YHLS base date (1 April each year) can be considered when demonstrating site deliverability if the site was considered deliverable at the base date.

- 9.7. The Council has contacted landowners and developers of larger sites for detailed information such as their expected trajectories for housing delivery and information in relation to progress being made towards delivery. Where information has been received from developers, this has been used to inform the inclusion of sites within the 5 Year Housing Land Supply, and this evidence can be found in document SDo7 (Major sites evidence), submitted with the draft APS. If no such information has been received from a developer, assumptions have been used for expected delivery, based on appropriate average delivery rates in the area as well as local and site-specific circumstances.
- 9.8. The Council has not applied deductions to the 5YHLS to account for unforeseen circumstances, as there is no requirement or guidance on whether local authorities should apply deductions, or any guidance on the size of any deduction. In addition to this, as part of the most recent stakeholder engagement between June and July 2024, the Council invited developers or agents to suggest whether discounts to the calculations for deliverable sites were considered appropriate and if so, what scale of discount was appropriate. Relevant appeal decisions were requested to back up the suggested discounting. No information on discounting was put forward by those who responded to the targeted engagement exercise.
- 9.9. On the 26 September 2024, Dorset Council received from PINS the Inspector's Report which confirmed that a 5-year supply of deliverable sites could be demonstrated. The Inspector assessed each site included in the Council's draft APS and made recommendations. Only sites and the number of units that were assessed by the Planning Inspector as being deliverable are included in the 5-year housing land supply.

## Major sites with planning permission 10

9.10. For sites of 10 dwellings or more that benefit from an extant detailed planning permission (either full or reserved matters) a case-by-case assessment has been made to assess how many new homes are likely to be delivered within five years. This case-by-case analysis has included consideration of the number and type of units being delivered on a site, the details of any infrastructure requirements, the discharge of conditions associated with the planning permission, whether a CIL commencement notice had been received, feedback from the developer as to their programme for developing the site, information from case officers working on specific applications, and any other relevant information.

<sup>&</sup>lt;sup>10</sup> Please see Appendix A: Major sites with planning permission for further detail.

- 9.11. Major sites which benefit from outline permission were considered in a similar way to detailed consents having regard to recent appeal decisions. Progress towards gaining full consent, along with information from the developer about their programme for delivering the site including their anticipated housing trajectory. Information from the case officer working on the application along with the current planning status of the site was also considered including the discharge of any planning conditions. As sites with outline planning permission would fall within limb B of the definition of deliverability, these have been separated out from sites with detailed consent (which fall within limb A) in Figure 8.1 below.
- 9.12. The approach to major sites that have either detailed or outline planning permission accords with the relevant parts of the definition of deliverable in the NPPF.

	Source supply	Amount deliverable within 5 years
Major sites with detailed planning permission (limb A)	6,263	5,008
Major sites with outline planning permission (limb B)	2,538	749
Major sites with planning permission (total)	8,801	5,757

Figure 8.1: Major sites with planning permission

## Sites allocated within the Local Plan<sup>11</sup>

- 9.13. For the sites allocated in an adopted Local Plan and the newly adopted Purbeck Local Plan (adopted 18 July 2024), a similar set of evidence was considered to that for major sites with planning permission, including information from the site developers and progress being made towards delivery. These considerations again gave rise to an assessed level of delivery for inclusion within the five-year supply.
- *9.14.* No allowance has been made for new allocations being considered through the emerging Dorset Council Local Plan as this emerging plan can be given very limited weight in planning decisions. The approach for sites allocated in the adopted development plan is considered to accord with the definition of deliverable in the NPPF.

<sup>&</sup>lt;sup>11</sup> Please see Appendix B: Sites allocated within Local Plans for further detail.

Figure 8.2:	Sites	allocated	within	the	Local Plan
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	Source supply	Amount deliverable within 5 years
Sites allocated within the Local Plan	3,939	678

## Sites allocated in Neighbourhood Plans<sup>12</sup>:

- 9.15. Across the Dorset Council area there were 33 neighbourhood plans that have been made part of the development plan on 1<sup>st</sup> April 2024. Buckhorn Weston and Kington Magna is the 34<sup>th</sup> neighbourhood plan but was made after the base date.
- 9.16. The made plans currently allocate land for around 1,419 new homes. These includes sites where pre-application advice has been sought. It should be noted that once a neighbourhood plan site has been granted planning consent, it is counted within the appropriate planning consent category rather than a neighbourhood plan site allocation.
- 9.17. The approach to Neighbourhood Plan allocations accords with the NPPF definition of deliverable.

Fiaure	8.3:	Sites	allocated i	in Neiah	bourhood	Plans
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	Source supply	Amount deliverable within 5 years
Site allocated in Neighbourhood Plans	1,437	343

## Specific Large Sites<sup>13</sup>

- 9.18. The minor sites windfall allowance does not make any allowance for sites not identified in the development plan that fall within the definition of major development (i.e. sites of 10 or more dwellings).
- 9.19. As set out under minor sites windfall, when including an allowance for windfall sites within the housing supply, national policy indicates that there needs to be "compelling evidence that they will provide a reliable source of supply..." and that the allowance

<sup>&</sup>lt;sup>12</sup> Please see Appendix C: Sites allocated in neighbourhood plans for further detail.

<sup>&</sup>lt;sup>13</sup> Please see Appendix D: Specific large sites for further detail.

"...should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".

- 9.20. Where specific major sites (10+ dwellings) have been identified that are expected to contribute to the housing land supply within 5 years, an allowance has been included. These sites have either been identified through the strategic housing land availability assessment, are on the Council's brownfield register, have permission in principle, or are sites where planning permission is likely to be granted imminently (i.e. sites with resolution to grant permission subject to a section 106 agreement). For each of these sites, there is clear evidence that development will begin, and homes will be delivered within the five-year period. Each site within this category was identified as having development potential at the 1 April base date in line with the monitoring data that underpins this report.
- 9.21. The approach to major identified (windfall) sites is in accordance with the definition of deliverable in the NPPF.

Figure 8.4: Specific Large Sites

	Source supply	Amount deliverable within 5 years
Specific Large Sites	2,841	218

## Minor sites with planning permission<sup>14</sup>

- 9.22. The NPPF definition of deliverable states that: "sites which do not involve major development and have planning permission ... should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years".
- 9.23. Within Dorset, a large proportion (around 25%) of the housing completions over the past 5 years have been made up of small sites of less than 10 dwellings, equating to an average of 399 dwellings per year. Historically, from the point of the grant of planning permission, just under 96% of these minor sites have been built within five years.
- 9.24. The approach adopted for minor sites with planning permission is considered robust and in accordance with the relevant parts of the definition of deliverable.

Figure 8.5: Minor sites with planning permission

<sup>&</sup>lt;sup>14</sup> Please see Appendix E: Minor sites with planning permission for further detail.

	Source supply	Amount deliverable within 5 years
Minor sites with planning permission	1,326.7	1,288

## Minor sites windfall allowance<sup>15</sup>

- 9.25. A windfall site is a site not specifically identified in the development plan. National policy makes provision for such sites to be included in the supply of homes specifically noting that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly".
- 9.26. When including an allowance for windfall sites within the housing supply, national policy indicates that there needs to be "compelling evidence that they will provide a reliable source of supply..." and that the allowance "...should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."
- 9.27. A detailed analysis of windfall rates has been undertaken for the Dorset Council area (as summarised in Appendix F). This analysis has been focused on those sites that fall within the minor category (i.e. sites of between 1 and 9 dwellings) with major (i.e. sites of 10 or more dwellings) being considered as a separate supply category.
- 9.28. A minor sites windfall allowance of 709 dwellings is equivalent to circa 1.8 years' worth of the average past delivery across the area over 5 years and is considered to be conservative figure. This is considered a conservative figure as past windfall delivery rates have been affected by COVID, inflation and nutrient neutrality. The final windfall allowance for each settlement is shown in Figure 8.
- 9.29. The approach to minor windfall sites is considered to be in accordance with national policy.

<sup>&</sup>lt;sup>15</sup> Please see Appendix F: Minor sites windfall allowance for further detail.

Area	Amount deliverable within 5 years
West Dorset, Portland and Weymouth	389.3
East Dorset	131.1
Purbeck	242.0
North Dorset	-53.4
Total	709.0

Figure 8.6: Minor sites windfall allowance for each former local authority area

## Rural Exceptions Sites<sup>16</sup>

- 9.30. The Inspector for the adopted West Dorset and Weymouth & Portland Local Plan recommended that rural exception sites that benefit from grant funding and a housing needs survey can be included within the five-year supply. This approach has been taken forward as it is considered to be robust and gives a degree of certainty over delivery of the site. Using the advice from the Council's housing enabling experts, sites that have registered providers on board have been included.
- 9.31. At present, there are a number of rural exception schemes proposed with a number of these have funding and a registered provider involved. They are all relatively small in scale meaning there are limited, if any barriers, to their delivery.

#### Figure 8.7: Rural Exception Sites

	Source supply	Amount deliverable within 5 years
Rural Exception Sites	132	6

<sup>&</sup>lt;sup>16</sup> Please see Appendix G: Rural exception sites for further detail.

## Supply Position at 1 April 2024

9.32. The sources of supply set out in this report have been rigorously assessed against national policy including the definition of deliverable as set out in the NPPF.

Supply Requirement	Total
Local Housing Needs Requirement	1,793
Requirement over 5 years (1,793 x 5)	8,965
Deliverable supply	8,999
Major sites with planning permission	5,757
Sites allocated in the Local Plans	678
Sites allocated in neighbourhood plans	343
Specified large sites	218
Minor sites with planning permission	1,288
Minor sites windfall allowance	709
Rural Exceptions Sites	6
Calculation of 5 year supply	
Deliverable supply ÷ annualised requirement	8,999÷ 1,793 = <b>5.02 years</b>

## 10. Conclusion: Five-year housing requirement against supply

- 10.1. The requirement to maintain a supply of deliverable sites to cover the 5-year period is derived from national policy. As the adopted Local Plans covering the Dorset Council area were adopted more than 5 years ago, the five-year supply calculation is based on the local housing need requirement derived through the application of the Standard Methodology. For the Dorset Council area, this gives a housing target of 1,793 new homes per year, equivalent to 8,965 dwellings for the 5-year period 2024 to 2029. In line with national guidance, no allowance has been made for any shortfall in provision against the Local Plan target due to the standard method being used (as the affordability adjustment compensates for any past undersupply).
- 10.2. The supply of deliverable sites that can be counted as being part of the 5-year supply for the 2024–2029 period is set out in Figure 8.8. It is based on sites considered deliverable on the 1 April 2024 base date. Based on the latest information and evidence available, Dorset Council can demonstrate a deliverable supply of 8,999 new homes on deliverable sites, equivalent to 5.02 years. These figures were confirmed by PINS in an Annual Position Supply report issued on 26 September 2024.