



Dorset Council

**SDo4 Summary of General Comments for the
Annual position statement**

July 2024

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Response reference	Respondent	Summary of issues	Council response
ASP01	Terrance O Rourke (Tor & Co) on behalf of Dudsbury Homes (and Intelligent Lands)	<ul style="list-style-type: none"> Looks at HDT rates and suggest that although they look good Dorset wide, for each former local authority area the actual HDT is not great. Suggests that the past housing delivery rate and supply is poor. Argues that the calculation of the LHN using standard methodology for across Dorset is incorrect, and the 2014 Housing Projections do not have a separate figure for Dorset. Consider it is incorrect for the local authority to add all LHN for former local authorities together as one affordability figure for Dorset. Considers that the Council cannot cap LHN figures either, as all areas except East Dorset have adopted Local Plan housing need figures and that these should be used instead rather than the standard methodology. Suggests that Purbeck Local Plan housing needs figure, as it is recently adopted, should be used. Using their interpretation of calculation for LHN and uncapped, the LHN figure is 1,844 dpa not 1,793 dpa. Provide detail on individual sites that they wish to contest but suggest deducting 638 units from major sites with detailed planning permission, 438 units from major site with outline planning permission, 779 units from sites allocated in local plans, 127 units from neighbourhood plan sites, 206 units from specific large sites and 36 units from rural exception sites. The total number of deductions proposed is 2,224. With suggested changes to how the local housing needs should be calculated thus increasing need, capped the HLS would be 4yrs and uncapped would be 3.99 yrs. Suggest that the Council has only 4 years of HLS. 	<ul style="list-style-type: none"> The HDT varies across the former Council areas, however as the Council are now producing a single 5YHLS position statement for the whole of the Dorset Council area, it makes logical sense to use a single HDT figure too. As all the Local Plans, excluding the Purbeck Local Plan, are more than 5 years old, the Council must use the standard methodology when calculating the 5YHLS. This figure should be capped. This is in accordance with the NPPF and PPG. In the APS, the Council has undertaken an exercise to examine the implications of using the adopted Purbeck Local Plan housing target using the standard methodology and housing targets for the former district areas. The outcome of this was a reduction of 30 units across the 5-year period. The 2014 Housing Projections predates the merging of former local authorities in the Dorset Council area, hence why there would not be a set figure for the Dorset area. However, adopting the approach that the local authority has used to ascertain one local housing need figure for Dorset would be considered practicable and reasonable particularly as the total of the district figures is the same as that for the whole county. Each year the government publishes affordability figures for local authority areas. Previously the equivalent figures had been published for the former district areas due to a request from the two councils in Dorset. For the 2023/24 year, Dorset Council was to move to a single housing land supply position statement and therefore no request has been made for the Dorset affordability ratio to be broken down to the former district areas. The Council provided individual responses to the site that were disputed and deducted or reduced the number of units inputted in the trajectory where the Council concluded that this was a reasonable approach.
APS02	Paul Newman (planning consultant)	<ul style="list-style-type: none"> Is of the view that the Council cannot demonstrate a 5-year supply. 	<ul style="list-style-type: none"> The respondent provided no evidence to support this suggestion. The Council has prepared the Annual Position Statement in good faith, using up-to-date evidence.
APS03 APS04	Emery Planning on behalf of : <ul style="list-style-type: none"> Nightingale Land and Wyatt Homes 	<ul style="list-style-type: none"> States that the draft APS shows that the Council has a deliverable supply of 9,573 dwellings (equating to 5.34 years supply). The respondent concludes that 2,770 dwellings should be removed from the deliverable supply. For this reason, they conclude that the deliverable supply at 1 April 2024 is therefore 6,803 dwellings, equating to 3.79 years supply. Notes that for there to be a shortfall, the Inspector would need to find that 608 dwellings (6% of claimed supply) that should not be included in the deliverable supply. Details of the sites/dwellings the respondent considers should be removed are set out in Disputed Sites. Agrees that Dorset is required to demonstrate a 5YHLS against the local housing need rather than a 4YHLS. Agrees that the relevant five-year period for the base date is 01/04/24-31/03/29. Agrees that the local housing need is capped at 1,793 dwellings. Agrees that latest HDT result is 97%, the 20% buffer does not apply, and an action plan is not required. Consequently, the tilted balance is not triggered because of the HDT result. The respondent however argues that the tilted balance will apply due to there being a 5YHLS shortfall. Mentions that correspondence with developers of specific sites is not clear evidence of deliverability. Appendix H of the Draft APS should be compared with 	<ul style="list-style-type: none"> The Council notes the opinion regarding the level of housing land supply and has responded to the site-specific comments in SD05: Disputed Sites. The Council's housing land supply position is set out in the main APS report, having taken the responders' comments into account. The Council agrees that a 5YHLS should be demonstrated. Regarding the comments relating to submitted developer proformas and the need for clear evidence of deliverability, the Council has assessed a site's deliverability on a case-by-case basis, and a submitted proforma is considered to be an important piece of evidence as it sets out a developers/agents/landowner's intent, based on their expertise regarding a specific site. For sites in the 5-year supply, their inclusion may be based on the important evidence of a submitted proforma <u>and</u> other evidence of deliverability such as a submitted planning application, pre-application discussions, and the progress being made towards gaining planning permission and the subsequent work to address conditions related to a planning consent. Reasoning for a sites inclusion in the supply can be found in SD05 Dispute Sites and SD07: APS Evidence Document for Major Sites. Rather than providing generic assumptions on delivery rates in the APS, the Council has sought the expertise of developers of specific sites to inform delivery rates, and where developer input has not been received, has made an informed judgement based on what a reasonable expectation of delivery might be, based on local circumstances and previous rates of delivery.

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		<p>evidence provided by Braintree, South Oxfordshire, West Oxfordshire and South Kesteven Councils. These appeals set out what is clear evidence to support the inclusion of sites in the 5YHLS. (See Appendices to Rep APS03).</p> <ul style="list-style-type: none"> States that the Council should not include any new sites, which are not already within its schedule of sites as being deliverable at the base date – as this would effectively mean changing the base date to beyond 1 April 2024. Several appeal decisions have found this approach inappropriate (i.e. Wavendon Properties Ltd against Milton Keynes Council; Darnhull Estate against Cheshire West and Chester Council). States that the base five-year requirement based on the local housing need is 8,965 dwellings (i.e. 1,793 x 5 years = 8,965). Explains that as the five-year housing land supply is to be measured against the local housing need, there is no requirement to specifically address under delivery separately as this has been factored into the affordability ratio. <p>Deliverability and clear evidence</p> <ul style="list-style-type: none"> Reiterates the definition of ‘deliverable’ sites. They also consider the clear evidence required to support ‘deliverable’ sites. <i>Considers that with the absence of any written evidence</i> – where no evidence has been provided for inclusion of category b sites, these sites should be removed. <i>Argues that the most up to date evidence, meaning the latest available evidence</i> should be used – but only in relation to sites already in the supply. Evidence can post date the base date to support sites in the deliverable supply and not seek to introduce new sites. Where sites have not progressed as the Council’s trajectory claimed at the time the position statement is published, the supply should be reduced. <i>Suggest that the Council needs to Form and value of the evidence. They go on to say that</i> a proforma can in principle provide clear evidence of a site’s deliverability however evidential value of the written information is dependent on its content. It is not sufficient for Council’s to provide agreement from landowners and promoters that their intention is to bring sites forward; the evidence needs to provide a realistic prospect that housing will be delivered on the site within five years. Refer to a number of appeal decisions (summarised in APS03) and APS inspectors (South Kesteven 2022 and 2023) have found that sites with outline permission for major development and allocated sites without planning permission should not be included in the deliverable supply where the respective councils had failed to provide clear evidence. Proformas and other evidence from those promoting sites found not to be clear evidence. <p>Sites included in supply</p> <ul style="list-style-type: none"> Notes that the Council includes 964 dwellings on 16 large sites which did not have planning permission on 1 April 2024 but were allocated in Local Plans. All sites are disputed. Full details and reasons given in the representation. States that the Council includes 263 dwellings on 10 sites which did not have planning permission on 1 April 2024 but were allocated in Neighbourhood Plans. 245 dwellings on 8 of these sites are disputed. Full details and reasons given in the representation. Explains that the Council includes 465 dwellings on 14 specific large sites. The sites did not have detailed planning permission at the base date. 359 dwellings on 10 of these sites are disputed. 	<ul style="list-style-type: none"> Regarding the ‘Lichfield’s Start to finish’ report the Council notes that this can be a useful tool in understanding national delivery rates for different development scales. However, the Lichfield’s report provides national ‘average’ or median delivery rates, and the Council prefers to base its estimates of delivery on the expertise of developers of specific sites, knowledge of local circumstances, and annual monitoring of sites. It is considered that this presents a more accurate assessment of delivery than using a wider national picture. The Council notes also that the build out rates in the Lichfield’s report do show instances where delivery is much higher than the national average, showing that it is possible to achieve higher rates of delivery. With reference to lead-in times for development, the Council has used its knowledge of specific sites, consultation with development management colleagues, and input from developers themselves to inform a reasonable expectation of lead in times for sites that have outline planning permission or otherwise. Lead in times are liable to vary on a case-by-case basis and so the Council considers its approach to be robust.

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		<ul style="list-style-type: none"> Mentions that the Council includes 56 dwellings on 6 rural exception sites. 22 dwellings on one site are disputed. States that the Council includes 851 dwellings on 13 large sites with outline planning permission. 701 dwellings on 12 sites are disputed. Notes that 5 sites with detailed planning permission are disputed. <p>Delivery rates and lead-in times</p> <ul style="list-style-type: none"> Refers to Lichfields' report 'Feeding the Pipeline' (November 2021) and concludes that for every district in England a further 4-5 medium sites a year or 4-5 larger sites over the next 5 year is needed to achieve Government policy on housing delivery over and above the usual number of permissions granted every year. States that in the Lichfields' Insight Report 'Start to Finish' (third edition March 2024) shows median average timeframes from validation of the first application to completion of the first dwelling for various sized sites. A site 100-499 dwellings will on average have a planning approval period of 2.8 years and a planning to delivery period of 3.2 years, and an overall lead in time of 6 years. This research should be taken into account and suggests that sites without a planning application pending determination shouldn't be included as deliverable in the 5YHLS. 	
APS05	Landström	<ul style="list-style-type: none"> Notes that the use of the unofficial HDT 2022 result calculated for Dorset Council (97%) is supported by policy or guidance. Suggests that the official HDT 2022 result requires a 20% buffer to applied to the North Dorset area. Therefore, concludes it is reasonable to expect a 20% buffer to be applied to the North Dorset proportion. Highlights that this increases the annual housing requirement figure from 1,793 to 1,864. Explains that if a 20% buffer were applied to the whole Dorset area the requirement would increase to 2,152. 	<p>Five years after its formation (on 1/4/2019), Dorset Council has decided to transition from calculating separate housing land supplies for each of the legacy local plan areas to calculating a single figure for the whole of the Dorset Council area for the following reasons:</p> <ul style="list-style-type: none"> It is suggested by Paragraph 025 of the NPPG: Housing Supply and Delivery. Reference ID: 68-025-20190722. The Council acknowledges that the current set of official HDT results are for the legacy areas. The Council's view is that if the housing land supply is going to be calculated at the Dorset Council level, then logically the HDT result should be calculated at the Dorset Council level. While an official result has not been published, the calculations are not difficult (the HDT rulebook sets out the methodology), and have been set out both in Figure 7.3 of the main APS report, and also in Appendix H. The results are high, ranging from 97% in 2022 (including Christchurch) to 106% in 2023 (excluding Christchurch). From this, it is clear that Dorset Council has been delivering a sufficient number of houses in the last 3-4 years against government targets. The Council considers this to be sufficient evidence to justify not applying a 20% buffer to the housing requirement figure.
APS06	Bidwells LLP on behalf of the North of Dorchester Consortium	<ul style="list-style-type: none"> Object to a single housing land supply figure on the basis that it masks the lack of supply in individual former authority areas, or pressurised sub areas such as Dorchester. Considers that the current methodology risks a lack of strategic planning for Dorchester. Suggests that the housing supply position should be re-calculated in the APS for smaller housing market areas to provide a more accurate position. Explains that by extracting relevant sites from the APS for the West Dorset area indicates a deliverable supply of 2,630 units – set against the most up to date 	<ul style="list-style-type: none"> Five years after its formation (on 1/4/2019), Dorset Council has decided to transition from calculating separate housing land supplies for each of the legacy local plan areas to calculating a single figure for the whole of the Dorset Council area as suggested in the NPPG. Dorset Council is not required by national planning policy to continue calculating its housing land supply separately for former authority areas, nor for any other sub-area. The Council considers it appropriate that after 5 years of having formed as a Unitary Council the housing supply should be calculated for the whole area. This approach will not

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		housing requirement of 541 dpa, this gives at best a 4.86-year housing land supply.	affect strategic planning for different housing market areas within Dorset Council, as this will be a separate exercise to be undertaken through the production of a new Local Plan.
APS07 APS08	Intelligent Land on behalf of: <ul style="list-style-type: none"> Dudsbury Homes (LM) Limited covering letter and Dudsbury Homes (Ferndown) 	<ul style="list-style-type: none"> Highlights that Dudsbury Homes (LM) Limited and Dudsbury Homes (Ferndown) has interests in potential development land in the village of Lytchett Matravers which could potentially meet housing needs. Concerned that the Council did not carry out a robust and proper assessment of its available housing supply and suggest that the Council are underestimating and artificially constraining future potential housing development. Commissioned Tor & Co to review the APS; a) to assess past delivery, b) review the 5-year requirement, c) assessment of the 5YHLS and d) recalculation of current 5YHLS. Argues that the Council should not be using the standard methodology for calculating housing need and suggests that area local housing needs figures should be uncapped. Suggest deducting 638 units from major sites with detailed planning permission, 438 units from major site with outline planning permission, 779 units from sites allocated in local plans, 127 units from neighbourhood plan sites, 206 units from specific large sites and 36 units from rural exception sites. The total number of deductions proposed is 2,224. With suggested changes to how the local housing needs should be calculated thus increasing need, the HLS would be 4yrs with a capped LHN and 3.99yrs with an uncapped LHN. 	<ul style="list-style-type: none"> Notes Dudsbury land interests in the area. The Council assessed all allocated sites, sites with detailed planning permission, outline, SHLAA/ Brownfield, Rural Exceptions and Neighbourhood Planning sites against the definition of deliverable in the NPPF and PPG. In the Council's view, only sites that meet the definition of deliverability and that had clear evidence of deliverability were inputted in the 5YHLS. As all the plans, excluding the Purbeck Local Plan, are more than 5 years old, the Council must use the standard methodology when calculating the 5YHLS. This figure should be capped. This is in accordance with the NPPF and PPG. In the APS, the Council has undertaken an exercise to examine the implications of using the adopted Purbeck Local Plan housing target using the standard methodology and housing targets for the former district areas. The outcome of this was a reduction of 30 units across the 5-year period. The Council provided individual responses to the site that were disputed and deducted or reduced the number of units inputted in the trajectory where the Council concluded that this was a reasonable approach.
APS09	Prime UK Developments Ltd	<ul style="list-style-type: none"> Highlights a site in Dorchester (Oak House Poundbury Road, Dorchester DT1 1SW) that has recently gained prior approval consent for conversion into 18 flats - P/PACD/2024/02026. Suggests the developer's (Prime's) intention is to redevelop the site for 60 apartments for key workers. Intention to submit for planning approval in December 2024, receive consent in June 2025, and deliver homes by December 2026. 	<ul style="list-style-type: none"> The Council acknowledges and welcomes the details provided however considers that it would not be appropriate to include this site in the 5-year housing land supply at this stage. The prior approval was submitted, and permission granted outside of the base period of April 2023 to March 2024, and the site has not previously been identified as deliverable.
APS10	Wates Developments	<ul style="list-style-type: none"> Considers that many of the sites do not fall within the NPPF definition of deliverable and therefore the Council cannot demonstrate a 5-year supply. Suggests that the Council has accepted the proforma responses without any investigation or consideration. Significant caution should be given to these assumptions. Questions why sites granted consent back to 2011 are suddenly deliverable. Notes that for sites with outline consent, many are pushed back to year 5 without evidence to demonstrate this. If the projections are pushed by one year, it would reduce supply by circa 200 homes. Suggests that there is Insufficient evidence for allocated sites, and some have had planning applications for several years. Around 400 units can be removed from the supply. 	<ul style="list-style-type: none"> The Council has prepared the APS in good faith, using up-to-date evidence and making professional assessments of sites where appropriate. Evidence included the site's planning and building control records history, site visits, engagement with agents/ landowners and assessing past delivery rates if applicable. This representation makes some general points but does not identify issues with specific sites. Neither is clear evidence submitted for sites to be excluded from the 5YHLS. Other representations provide commentary on specific sites, and these points are directly addressed in SD05: Disputed Sites.

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		<ul style="list-style-type: none"> Concludes that in total, around 1,000 homes are not deliverable, and the Council cannot demonstrate a 5-year supply. 	
APS11	Formerly David Shaw Partnership	<ul style="list-style-type: none"> Agrees that the evidence provided demonstrates a 5-year housing land supply. Reference to an appeal hearing for Land south of Westleaze, Charminster (APP/D1265/W/18/3206269) in which the Inspector concluded that Dorset Council, at that time, could demonstrate a 5-year housing land supply. 	<ul style="list-style-type: none"> The Council acknowledges these comments.
APS12	Cala Homes	<ul style="list-style-type: none"> Recommends that the Council should include the site at land west of New Road, West Parley an allocated site in the adopted in the Christchurch and East Dorset Local Plan Part 1. Set out in detail the trajectory that is achievable, 27 units in 26/27, 40 units in 27/28 and 40 units in 28/29. Recommends this sites inclusion after undertaking due diligence. The national housebuilder highlights that they are confident that viability issues can be overcome to deliver new homes and infrastructure in West Parley. The respondent states that they had undertaken pre-app discussion with the Council. 	<ul style="list-style-type: none"> The Council asked the respondent for further information to assess if this site can be included within the 5YHLS, as it is an allocated site for development.
APS13	A.E. Adams Estates Ltd	<ul style="list-style-type: none"> Highlights a site in their ownership (Brackenbury Centre and Underhill Methodist Church with related land at Fortuneswell, Portland) that may be suitable for inclusion as suitable for development for approximately 24 units. 	<ul style="list-style-type: none"> The Council acknowledges the details provided however considers that it would not be appropriate to include this site in the 5-year housing land supply at this stage. National planning guidance details the need for 'clear evidence' that sites will be delivered within the 5-year period, and currently for this site clear evidence is not available.
<ul style="list-style-type: none"> APS14 APS15 APS16 APS17 APS18 	<p>Chapman Lily Planning on behalf of:</p> <ul style="list-style-type: none"> Aster Homes Bellway Homes Betterment Properties M. B. Crocker & P&D Crocker WH White Ltd 	<p>Summary of position</p> <ul style="list-style-type: none"> Considers that it is appropriate to assess housing supply across the Dorset Council area, given that Dorset Council has been established for a number of years. Suggests that there is only a realistic 5-year supply of circa 7,796 dwellings based on the requirement of 1,793 – only a circa 4.34 years housing supply. Suggests that a submitted proforma and email responses provided by developers and agents of specific sites is, in isolation, inadequate evidence of deliverability. For small sites, concludes that a suitable deduction in numbers should be accommodated to account for lapsed permission and other factors – provides examples of sites for which delivery in 5 years is very unlikely. Housing need: No dispute regarding the approach of calculating the Local Housing Need for the Dorset Council area using the Standard Method. Approach to 'clear evidence': In their view, based on a review of appeal decisions, the following considerations are presented as to whether a site within limb b) has the necessary clear evidence to be considered deliverable: <ul style="list-style-type: none"> Onus rests with the LPA to provide the clear evidence that first homes will be delivered within the 5-year period – and evidence should be included in the APS or published alongside it. Evidence must be suitably robust and relevant to delivery of housing on a site. Evidence requires more than just statements by landowners, agents, or developers. 	<p>Summary of position</p> <ul style="list-style-type: none"> The Council notes the opinion regarding the level of housing land supply and has responded to the site-specific comments in the SD05: Disputed Sites. The Council's housing land supply position is set out in the main APS report, having taken the responders' comments into account. Regarding the comments relating to submitted developer proformas and the need for clear evidence of deliverability, the Council has assessed a site's deliverability on a case-by-case basis, and a submitted proforma is considered to be an important piece of evidence as it sets out a developers/agents/landowner's intent, based on their expertise regarding a specific site. For sites in the 5-year supply, their inclusion may be based on the important evidence of a submitted proforma <u>and</u> other evidence of deliverability such as a submitted planning application, pre-application discussions, and the progress being made towards gaining planning permission alongside progress to discharge associated conditions. Reasoning for a sites inclusion in the supply can be found in SD05: Dispute Sites and SD07: APS Evidence Document for Major Sites. On the subject of deductions to the supply figure on minor sites, there is no requirement in national planning policy or guidance to include such deductions, and the Council considers that, taking into account the conservative level of minor sites windfall allowance included in the supply, there is not a need to include such a deduction. It is worth mentioning that the respondent did not submit clear evidence to justify using this deduction. Housing need: Noted.

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		<ul style="list-style-type: none"> ○ Application for reserved matters can be a key milestone, but firm progress of determination of an application and likelihood of positive outcome is also relevant to demonstrate clear evidence. ○ Where a site is a long-standing inclusion within housing land assessments, delivery assumptions should be approached with considerable caution. ○ Where there is no firm progress demonstrated by the LPA on a site, this should be approached with caution. ● Notes that the requirement for the LPA to provide evidence to support the inclusion of a site as being deliverable represents a high bar. ● Refers to the following Secretary of State and appeal decisions in which sites with outline permission or lacking planning permission have been removed from the relevant supply by the Inspector: APP/Z1510/V/17/3180729 (Land east of Gleneagles Way, Hatfield Peveler) and APP/P1560/W/17/3185776. ● Refers to appeal APP/Q3115/W/20/3265861 in which the Inspector takes the view that 'clear evidence' must be something cogent, as opposed to simply mere assertions, and that there must be strong evidence that a site will deliver housing in reality. ● Specifically highlights that in the same appeal the Inspector makes the observation that clear evidence requires more than being informed by landowners, agents or developers that sites will come forward – it is more that the factors concerning delivery have been considered - further detail of which is in the full comments). ● Five-year period: Agrees that the appropriate 5-year period for the APS is 2024-2029. ● Sources of supply: Response sets out a number of tables where sites are disputed – focusing in detail on major sites (over 10 units), with the definition of deliverable sites set out in Annex 2 of the NPPF. ● Highlights that there are several sites with outline permission only for major development, or where an application is yet to be determined – fall within limb b of the definition – need clear evidence. ● Delivery rates and lead in times: Considers that little detail provided in the APS on assumptions concerning delivery rates. ● Suggests that there are some cases of a clear mismatch between anticipated delivery rates and completion rates. ● Highlights that whilst in recent years average annual delivery rates have seen an increase compared to previous averages, political uncertainty and market and economic conditions are likely to adversely impact on build out rates. ● Reference to the 'Start to Finish – how quickly to large scale housing sites deliver' report prepared by Lichfields March 2024 - mean annual build out rates have dipped slightly for all site sizes compared to previous editions of the research. ● Reference to headline messages of the national report regarding lead in times and build out rates (see full response for details). ● Provides two examples of Bellway Homes sites: <ul style="list-style-type: none"> ○ St. Mary's Hill Blandford (350 dwellings) – 5 years 9 months from validation of first outline application to first dwelling completion. ○ Land East of New Road, West Parley (386 dwellings) - 6 years and 3 months from validation of first application to first dwelling completion. ● Lichfields report also confirms that tough market conditions mean a likely slowing in build rates and housing building overall. 	<ul style="list-style-type: none"> ● Approach to 'clear evidence': See response to the 'summary of position' section above, and SD05: Disputed Sites. The Council has demonstrated 'clear evidence' of the deliverability of sites included in the APS housing land supply, through proformas submitted by developers and agents, as well as additional evidence of sites' progress towards gaining planning permission and on to delivery. ● Five-year period: Noted. ● Sources of supply: See SD05: Disputed Sites. ● Delivery rates and lead in times: Rather than providing generic assumptions on delivery rates in the APS, the Council has sought the expertise of developers of specific sites to inform delivery rates, and where developer input has not been received, has made an informed judgement based on what a reasonable expectation of delivery might be, based on local circumstances and previous rates of delivery. ● Regarding 'Lichfield's Start to finish' report the Council notes that this can be a useful tool in understanding national delivery rates for different development scales. However, the Lichfield's report provides national 'average' or median delivery rates, and the Council prefers to base its estimates of delivery on the expertise of developers of specific sites, knowledge of local circumstances, and annual monitoring of sites. It is considered that this presents a more accurate assessment of delivery than using a wider national picture. The Council notes also that the build out rates in the Lichfield's report do show instances where delivery is much higher than the national average, showing that it is possible to achieve higher rates of delivery. ● With reference to lead-in times for development, the Council has used its knowledge of specific sites, consultation with development management colleagues, and input from developers themselves to inform a reasonable expectation of lead in times for sites that have outline planning permission or otherwise. Lead in times are liable to vary on a case-by-case basis and so the Council considers its approach to be robust. ● On the subject of market conditions and construction outputs, developers who have provided trajectories to inform the APS would have already factored in these issues. Where a proposed trajectory from a developer is considered unreasonable the Council has 'tempered' this in the APS by making its own adjustments so that the trajectories are as reasonable as possible. This is addressed for each site within SD05: the Disputed Sites. Therefore, there is not considered to be a need to further account for reductions in construction output and market conditions in the APS. ● Lead-in times in Dorset context: See comments above. However, it is unclear how the respondents obtained this information, and if the research undertaken is accurate and comprehensive. ● Housing supply: Noted. ● Minor sites: See response to the 'summary of position' section above. ● Windfall: Noted. ● Rural exception sites: Sites which have planning permission would be captured within other categories of the supply in the APS. The Council is content that the evidence in place for the rural exception sites within the 5 year supply and doesn't consider that a discount is required. Comments regarding specific sites are address in SD05: Disputed Sites.

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		<ul style="list-style-type: none"> • Lichfields research also provides some helpful details with regard to average build out rates by size of site – table provided showing delivery rates of smaller sites. Whilst this can only be used as a more general benchmark, rates are significantly lower in comparison to some of the LPA anticipated Dorset delivery rates. • Emphasis a need for caution when assessing predicated delivery rates. • Reference to Land Matters – the critical role of sales outlets in boosting housing supply’ June 2024 report produced by Savills – sites gaining consent at lowest level in 15 years, number of outlets of national builders at a 20-year low. Sales at a lower rate than previous 7-year average. • Savills report indicates that the current trajectory for housebuilding is very poor and that almost every statistic suggests that housing supply is on a steep downward trajectory. • Reference to Lichfields and Pick Everard Market Intelligence Report 3Q July 2024 – construction output 5% lower previously. • Assessment concerning 5-year housing delivery should account for reductions in construction output. • Lead-in times in Dorset context: Planning process for major developments can include pre-application stage, preparation for pre-application submission, community involvement. In their view considers that: <ul style="list-style-type: none"> ○ lead in times after commissioning of circa 6 months before application submission is not uncommon. ○ Technical studies such as ecology can set a scheme back by a year. ○ Average determination time for outline permissions in Dorset (for sites in the APS) is circa 2.5 years. ○ Average determination time for reserved matters applications (from Appendix A of the APS) is circa 9 months. • Request that the Council examines average time Dorset Council takes to determine discharge of conditions requests - target time is normally eight weeks but can be longer for more complex conditions. Important to factor in lead in times for commissioning technical reports – will add considerably to time periods. • Mentions that a developer often has to contend with the separate legal processes concerning highways S.278 and S.38 agreements, as well as the Building Regulations. • Suggests that all developments require a period of time to provide for the immobilization of the development. • Highlights that it is not uncommon for there to be a reappraisal of the financial costs of the development after planning permission is granted, as well as value engineering resulting in minor amendments – can have a significant impact on delivery times. • Housing supply: Suggests that 5,876 dwellings are deliverable in the 5-year period in the categories in Appendices A-D of the APS, a difference of -1,637 dwellings compared to the Council’s figures. • Minor sites: Not unusual for delivery of minor sites to be delayed and for permissions to lapse or be superseded in some instances. • Suggest a percentage discount for non-implementation or lapse rate should be applied. Reference to a number of local authorities that have applied percentage discounts (Cornwall, Stroud, Somerset West and Taunton). 	

Response reference	Respondent	Summary of issues	Council response
		<ul style="list-style-type: none"> Refers to an appeal decision APP/D3125/W/22/3297487 Land at Witney Road, Ducklington – where a 10% reduction was deemed reasonable. Suggestion that a 10% discount should be applied to the supply from minor sites – reducing the supply by 129.5 dwellings. Windfall: Have not disputed the supply from windfall allowance as included in the APS. Rural exception sites: Comment that only 1 of the 6 sites identified appears to have the benefit of planning permission. The indicated delivery is at the end of the 5-year period and any slippage could well take the delivery beyond the 5-year period. Suggest that due to considerable uncertainty relating to the delivery of exception sites, a 25% discount should apply to the supply from this category – reducing the supply figure by 10.5. 	
APS19	Nexus Planning on behalf of Cavanna Homes	<ul style="list-style-type: none"> Provides a response by the developer on a specific site in the APS - Land West of Frome Valley Road, Crossways. States that the site currently benefits from reserved matters approval for 140 dwellings (P/RES/2021/01645). Makes clear that no dwellings can currently be delivered until restrictions imposed relating to Nutrient Neutrality are removed. Provides an anticipated delivery trajectory of 45 dwellings in 25/26, 26/27, and 27/28, and 5 dwellings 28/29. Explains that delivery of the site is predicated on the Council approving a material amendment (P/NMA/2024/02979) and discharge of condition on WD/D/20/000673. This would remove the restriction on commencing any development beyond Phase 1 (the site access). Highlights that without these approvals in place, Cavanna Homes cannot commit to the delivery of new dwellings at the site within the next five years. Mentions that approval of these applications is required in early July 2024 in order to meet projected delivery in 2025/26. Delivery of dwellings at the Site is also reliant upon the satisfactory discharge of pre-occupation conditions of the planning permission – notably condition 8 (rail safety signage). 	<ul style="list-style-type: none"> The Council acknowledges the details provided, and this information will inform the site's inclusion within the 5-year housing land supply.
APS20	Dorset Council Transport Planning	<ul style="list-style-type: none"> Provide no comments on sites that have full or outline consent. Note that sites allocated in local and neighbourhood plans without a permission/application may have specific highways issues that could make them undeliverable. 	<ul style="list-style-type: none"> Noted. The sites allocated in local and neighbourhood plans will be acceptable in principle, having undergone rigorous examination in order to support their allocations. This process would have involved input from the transport planning team. It is understood that detailed issues can arise at the application stage however these should not be insurmountable.