

# **WEST DORSET, WEYMOUTH & PORTLAND LOCAL PLAN**

## **MATTER NO 3: SPATIAL STRATEGY**

**ON BEHALF OF PERSIMMON HOMES SOUTH COAST**

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### **Appendix A: Comments on Peter Brett Associates note of the meeting to discuss the Objective Assessment of Housing Need**

### **3. MATTER 3 – SPATIAL STRATEGY**

#### **3.1 Are there alternative development options which would deliver a more effective and sustainable development strategy?**

3.1.1 Pegasus on behalf of Persimmon Homes South Coast and as part of the North Dorchester Consortium have promoted the development of land to the north of Dorchester throughout the preparation of the West Dorset Weymouth and Portland Local Plan; and prior to that the preparation of the West Dorset Core Strategy.

3.1.2 In 2012 Pegasus objected to the strategy for the Eastern Area (Dorchester, Crossways and Surrounds) as the strategy for this part of the plan area is not positively prepared as it does not meet the required development and infrastructure needs of the area at the most sustainable locations. It is not considered consistent with the Core Principles of the NPPF (see our representations on Policy DOR 11 25<sup>th</sup> July 2012.)

3.1.3 Dorchester is the county town, with a population of over 19,060, consequently as the district's largest town it should take the largest share of new development for both housing and employment and make provision for sustainable affordable housing need.

3.1.4 Dorchester has long been recognised as a sustainable location for growth (in the RSS {former RPG 10} September 2001. It was identified as an Other Designated Centre for Growth (ODCG). These towns act as centres for wider rural areas and form a single focus for attracting a good range of services and facilities, thus reducing the need to travel. In the Draft RSS these towns were considered to be the most appropriate centres for locating some sub-regional growth. The recognition of Dorchester as ODCG is consistent with the saved Structure Plan for Bournemouth, Dorset and Poole, which promoted Dorchester as a focus for the development of employment, shopping, education, tourism, recreation and services for the sub-region.

3.1.5 Development at Dorchester would deliver a more effective and sustainable development strategy.

3.1.6 The benefits of concentrating most development in locations where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes has also long been recognised as a fundamental objective of sustainable development. Dorchester as the county town with a wider range of facilities and services should therefore accommodate most of the needs for the Eastern Area of the Plan.

3.1.7 As mentioned in our representations in 2012, 2013 and 2014 there remains a clear strategic case to support significant new development at Dorchester to improve its self-containment and address the housing affordability issue. There are no overriding planning or environmental constraints to prevent delivery of an urban extension to the north of Dorchester. It lies within easy walking distance of the town centre and main employment opportunities and supported by a range of complementary transport measures would deliver improved self-containment and sustainable growth and green infrastructure to the benefit of the town.

3.1.8 These issues will be considered in further detail in Matter 13.

**3.2 Is the overall distribution of housing and employment appropriate to the needs of the two areas?**

3.2.1 Pegasus on behalf of Persimmon Homes South Coast and as part of the North Dorchester Consortium consider that the distribution of housing and employment is not appropriate to meet the needs of the two areas.

3.2.2 Pegasus have submitted representations that there is no evidence to justify that the requirements cannot be met in West Dorset and that the Council need to rely on the surplus in Weymouth and Portland to meet needs. (see representations to the Further Proposed Changes in September 2014 and also previous representations in October 2013 on the Proposed Modifications and in July 2012 on Pre-Submission Draft).

3.2.3 The Council refer in the Committee report of 9<sup>th</sup> June at para 5.24 that it has already been necessary to propose development in the AONB and that a higher rate of development will increase environmental impacts.

3.2.4 However, development at north Dorchester is not within the AONB or subject to environmental constraints and yet it has not been included in the plan to meet the requirements to 2031.

3.2.5 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF also states that there is a need to ensure that the three dimensions to sustainable development: economic, social and environmental are mutually dependent.

3.2.6 Para 8 of the NPPF states that:

**“Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”**

3.2.7 The Council state in the Committee report of 9<sup>th</sup> June at para 5.26 that the increase in the housing requirement affects West Dorset far more than Weymouth and Portland and that an oversupply against the requirement was already planned in Weymouth and Portland due to the priority given to economic regeneration in the Borough.

**“Using a whole plan area target, and the existing housing land supply, we would be able to demonstrate sufficient supply to 2028 for the whole plan area. With separate targets there would be a significant shortfall in the supply for West Dorset. Adopting the plan with less than ten years’ post-adoption supply would not be a sound option.”**

3.2.8 There is clearly a shortfall in terms of meeting the needs of West Dorset, so much so that the Council has felt it necessary to reduce the plan period from 2028 to 2031, rather than consider any additional allocations, and it has also considered it necessary to produce a single housing requirement for both local planning authorities.

**3.3 What effects will the balance of homes and jobs be likely to have in reducing commuting pressures?**

- 3.3.1 The balance of homes and jobs will be likely to increase the commuting pressures rather than reduce them since apart from the build out of Poundbury at Dorchester there is only a few smaller mixed use sites proposed at the county town in the plan period.
- 3.3.2 As a result of the proposed strategy it is difficult to see how the strategy will reduce commuting pressures, when the housing requirement for West Dorset will to some extent be met in Weymouth and Portland.
- 3.3.3 The imbalance between housing and jobs has been long recognised in Dorchester, and this was one of the reasons why the Panel for the South West Examination in Public recommended that an urban extension to Dorchester should be included in the RSS. The West Dorset Partnership in its vision for Dorchester states that there is a need to "Achieve a balance between housing and jobs by further housing development to provide choice for people to live and work locally and help reduce commuting."
- 3.3.4 The background paper, at paragraph 3.6 states that Dorchester has around twice as many jobs (15,100) as has economically active residents (7,680) and concludes on page 9 that one of the challenges is to try to improve the balance between housing and jobs in the town of Dorchester. The town is the centre of many services and activities in the locality; it has two rail stations and although bus services are provided to the villages these are "inconsistent", consequently there are high levels of commuting. The strategy for the Eastern Area of the Local Plan does not recognise the needs, size and role of the settlement of Dorchester and neither does it address the imbalance between jobs and housing, development should therefore be located at Dorchester.
- 3.3.5 The benefits of concentrating most development in locations where homes, jobs and facilities will be easily accessible to each other and there is a choice of transport modes has also long been recognised as a fundamental objective of sustainable development. Dorchester as the county town with a wider range of facilities and services should therefore accommodate most of the needs for the Eastern Area of the Plan.
- 3.3.6 At 2001 West Dorset was a minor net importer of labour with 2,639 people commuting into the district to work. At 2011 West Dorset is now a major importer of labour with 6,620 people commuting into the district to work;

- 3.3.7 At 2001 Weymouth was a major exporter of labour with 7,652 people commuting out of the district to work. At 2011 Weymouth continues to be a major net exporter of labour with 8,547 people commuting out of the district to work.
- 3.3.8 At 2001 the HMA was a major net exporter of labour with 5,013 people commuting out of the HMA to work. At 2011 the HMA is a minor exporter of labour with 1,927 people commuting out of the HMA to work. 11,016 people commute in to work whilst 12,943 commute out.
- 3.3.9 Although the degree of net out commuting from the HMA has decreased between 2001 and 2011, the numbers of people commuting from Weymouth & Portland to West Dorset for work has significantly increased. The imbalance between jobs and workers within the two districts is significant.
- 3.3.10 8,355 people commute out of Weymouth & Portland each day to work in West Dorset. This has increased since 2001.
- 3.3.11 A significant number of people commute out of the HMA to work in Purbeck (2,285), North Dorset (1,065), Poole (1,114), and South Somerset (3,879).
- 3.3.12 Increase in jobs likely to have driven the decrease in net out commuting from the HMA rather than other way round.
- 3.3.13 There remains a clear strategic case to support significant new development at Dorchester to improve its self-containment and address the housing affordability issue. There are no overriding planning or environmental constraints to prevent delivery of an urban extension to the north of Dorchester. It lies within easy walking distance of the town centre and main employment opportunities and supported by a range of complimentary transport measures would deliver improved self-containment and sustainable growth and green infrastructure to the benefit of the town.

**3.4 Is there sufficient flexibility in the Plan to respond to changing circumstances?**

- 3.4.1 Pegasus on behalf of Persimmon Homes South Coast consider that the plan has now been prepared in such a way that it is inconsistent with the NPPF i.e. that it cannot respond to changing circumstances.
- 3.4.2 Pegasus consider that the plan fails to meet it objectively assessed housing needs let alone provide sufficient flexibility to respond to changing circumstances, this has been set out in detail in our most recent submissions in response to the Further Proposed Changes in September 2014.
- 3.4.3 In order to be consistent with the NPPF the local planning authority should positively seek to meet the development needs of their area and local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change (paragraph 14). Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (para 21). Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change (para 154).
- 3.4.4 The proposed submitted Plan with changes, June 2013 acknowledges in para 11.1.5 that:

**“The existing and proposed sites outlined above comfortably meet the needs of the town for the early part of the plan period, but fall short of meeting the needs for housing and employment in this area for the full 20 years of towards the end of the plan period. However there are no easily deliverable sites for major growth. A proposal is therefore included for Crossways (a village to the east, connected to Dorchester by the rail line) which is contained in the following chapter, and further investigations are proposed in relation to land around the Dorchester the plan area - .for the period post 2026 (see Policy SUS 1)” my emphasis.**

- 3.4.5 It should also be noted that the submitted plan (2012) did not have a full supply for West Dorset up until 2031 end date, instead it referred to para 11.7.1 and the development of an urban extension at Dorchester or in the surrounding area could provide additional housing and employment opportunities to support longer-term growth.
- 3.4.6 The most recent Further Proposed Changes (August 2014) to the plan shorten the plan period to 2028 on the basis that their evidence indicates a housing requirement for the original twenty year plan period that exceeds the available supply.

3.4.7 The Council acknowledge in para 5.30 of the Policy Scrutiny Committee report of 9<sup>th</sup> June that:

**“The addition of more housing allocations would provide us with a longer land supply and more robust plan, but public consultation on the larger amount of additional housing land required needs to be given more time than we have at this late stage of the plan period.”**

3.4.8 It should be noted that following the consultation on the Pre-Submission Draft for the Plan in summer 2012; the Council during November and December 2012, published Alternative Sites for consultation, although these not sites endorsed by the Council and there was no SA of the sites.

3.4.9 Consultation took place on the “Alternative Strategy” between 31st January and 24th March 2013 this comprised a four page leaflet entitled “Potential housing and employment site at Dorchester and proposed changes to previously suggested sites at Sherborne, Beaminster and Crossways.” Included in the “Leaflet” were proposed policies and plans.

3.4.10 The consultation was supported by a Sustainability Appraisal of Alternative Land Allocations in West Dorset – February 2013. However, this was not a comprehensive appraisal and only focused on those areas of change.

3.4.11 Pegasus consider that the plan should provide a positive planning framework for further long-term growth and development at North Dorchester. This will give further flexibility to accommodate needs including those not anticipated in the plan and to allow a response to changes in economic circumstances as required by the National Planning Policy Framework.

3.4.12 Comprehensive development at North Dorchester is able to provide for the wider needs of Dorchester in terms of green infrastructure and recreation space on site.

3.4.13 The Council acknowledge in Para 9.1 of the Policy Scrutiny Committee report 9<sup>th</sup> June 2014 that if the allocated sites in the plan do not come forward at the rates anticipated then they will not achieve the rate of development intended and the Council would not be able to demonstrate a 5 year supply. If they do not allocate sufficient land for development, they risk exacerbating the current trend of a decline in the workforce and worsening affordability.

**3.5 Is the latest assessment of housing robust and representative of needs in the two authority areas?**

3.5.1 Pegasus on behalf of Persimmon Homes South Coast consider that the latest assessment of housing is not robust or representative of the needs of the two authority areas.

3.5.2 Pegasus has objected to the assessment of the objectively assessed housing need, both in representations in response to the Proposed Modifications in Summer/Autumn 2013 and more recently in response to the Further Proposed Changes, September 2014.

3.5.3 Pegasus consider that the latest assessment of housing is neither robust or representative of the needs of the two authority areas. In our previous representations Pegasus have provided a critique of the Housing Review in 2013 and more recently we have prepared a Housing Evidence Base Review (as part of the representations on the Proposed Focussed Changes –September 2014) which provides a more detailed assessment of the SHMA and its underpinning assumptions and is supported by the Chelmer Demographic and Housing Review Paper.

3.5.4 The Housing Evidence Review Paper is in two parts:

- The first part of this paper assesses the HMA's evidence which has determined and justifies the housing requirement against National Planning Policy Guidance and Planning Practice Guidance as well as good practice arising from Inspector's Reports of Local Plan examinations of emerging plans elsewhere within England.
  
- The second part of this paper provides evidence to demonstrate the appropriate level of housing provision for the HMA, to provide for arising needs and demands of the population and economy, based upon projections generated by the Chelmer Housing and Population Model, which uses a demographic methodology to determine future housing provision.

- 3.5.5 Using the robust Chelmer Model it is considered that the starting point for identifying a housing requirement to meet demographic requirements and meet the Council's job growth target (of 2,300) would be at least 1,015 dwellings per annum across the HMA over the plan period 2011 – 2031, this would equate to at least 20,300 dwellings (by LPA this is 770 dwellings per annum for West Dorset and 246 dwellings per annum in Weymouth and Portland). This is based on replicating the Council's SHMA Scenario 3 2001-2007 Trends and includes unmet need as identified in the SHMA 2014. (The PBA SHMA identifies unmet need of 1,169 and 1,244 for West Dorset and Weymouth and Portland respectively.)
- 3.5.6 The proposed housing provision will not significantly boost housing supply, meet the economic objectives of the plan or reflect market signals.
- 3.5.7 Based on the Council's housing requirement West Dorset District Council area is entirely reliant on the surplus of housing in Weymouth and Portland to meet the housing needs of West Dorset. Para 5.28 of the Policy Scrutiny Report of 9<sup>th</sup> June 2014 states that unless additional allocations are made in West Dorset then a single plan housing target is to be used.
- “Weymouth and Portland’s oversupply against its district level target would help to meet West Dorset’s shortfall, though in the review of the plan there will need to be greater focus on West Dorset.”**
- 3.5.8 Up until the Proposed Further Changes a housing figure for each local planning authority has been prepared.
- 3.5.9 Whilst the proposed housing requirement can be grounded in the HMA, there needs to be a breakdown to ensure that each LPA maintains a 5 year housing land supply. The crucial point is that paragraph 179 of the NPPF deals with situations where development requirements cannot wholly be met, within an LPA's own area – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. There is no evidence to justify that the requirements cannot be met in West Dorset and that they need to rely on the surplus in Weymouth and Portland to meet needs.
- 3.5.10 Whilst it has not been possible to agree a Statement of Common Ground in the time available with the Council and their consultants Peter Brett Associates, attached at Appendix A is a list of matters of agreement and disagreement in respect of the OAN.

**3.6 Is the phasing regime and housing trajectory realistic, appropriate and deliverable and capable of providing an adequate supply of housing land?**

- 3.6.1 Policy SUS 1 does not include a strict phasing policy in Amended Chapter 3 (September 2014), which allows for flexibility in the delivery of housing as required by the NPPF (paragraph 14). Table 3.4 of the Local Plan include an indicative phasing of when sites will be brought forward which demonstrates that the Council has considered the supply in order to maintain a continuous supply throughout the plan period. This is supported by Persimmon Homes.
- 3.6.2 An updated assessment of the five year land supply is included as the Amended Chapter 3 (September 2014). However, this does not provide detail of the delivery timetables of individual sites and so it is impossible to assess whether the individual site trajectories are realistic. However, simply by looking at Figure 3.1 of the Amended Chapter 3 the deliverable supply can be seen to be very optimistic. From 2011 to 2014 an average of 500 dwellings has been completed per annum. The greatest number of completions achieved in any one year in this area is 933 (since 1994/95). Nevertheless, Figure 3.1 expects circa 1,600 dwellings to be complete in 2018/19. It is consider that the phasing regime is inconsistent with the NPPF.

**3.7 Would the LP provide a 5 year housing land supply on adoption having regard to the need for an appropriate buffer (NPPF paragraph 47?)?**

- 3.7.1 Table 3.3 of the Amended Chapter 3 (September 2014) indicates that there is a sufficient deliverable supply to demonstrate a 5 year land supply including a 20% buffer for the combined local planning authorities.
- 3.7.2 In order to calculate the housing land supply a number of considerations need to be taken into account. Each is discussed separately below:
- 3.7.3 Housing requirement: The housing requirement proposed in the Local Plan is 775 dwellings per annum across the Housing Market Area. Representations are made on the robustness of this figure elsewhere (Matter 3 and in representations to the Further Proposed Changes –September 2014).
- 3.7.4 Buffer: The Council consider that persistent under-delivery exists and apply a 20% buffer as required by the NPPF. This is supported by Persimmon Homes.
- 3.7.5 Shortfall: The Council have considered the shortfall against the emerging Local Plan housing requirements for the period 2011 to 2014. However, the objectively assessed need (in the PBA SHMA) does not consider that there is a requirement to meet the longer term under-supply relative to the requirements in the previous Local Plan. The effect of this, is that the longer term under-supply will simply be dismissed. However, Persimmon Homes consider that supply should seek to account for this long-term failure of delivery in the short-term. In so doing, the under-supply relative to previous plans (it can be calculated from page 2 of the February 2014 Housing Land Supply report that there is an additional under-supply of 1,019 dwellings from 1994 to 2011) should also be included in the five year land requirement.
- 3.7.6 The Council have adopted the Sedgefield approach, to addressing the under – supply, this approach is supported by Persimmon Homes.
- 3.7.7 Deliverable supply: As previously noted, the deliverable supply has not been detailed and so it is impossible to provide site specific comments. However, the cumulative delivery is simply unrealistic.
- 3.7.8 The effects of these considerations, is that it is very unlikely that a five year land supply will be able to be demonstrated. Additional sources of supply will need to be identified to address this.

**3.8 What are the implications of adopting an overall housing target for the 5 year housing land supply calculations for the individual authorities?**

3.8.1 The implications of adopting an overall housing target for the 5 year housing land supply calculations for the individual authorities are that the housing target for the HMA “masks” the vulnerable housing land supply position in West Dorset District Council. The Council acknowledge this point in para 5.28 of the Policy and Scrutiny Committee (9th June 2014)

**“This would require the use of a single plan-area target, unless additional allocations are made now in West Dorset. This would mean that in these forthcoming ten years of the plan period, Weymouth & Portland’s oversupply against its district-level target would help to meet West Dorset’s shortfall, though in the review of the plan there will need to be greater focus on West Dorset.”**

3.8.2 The preceding paragraphs (5.24 and 5.27) clearly set out why the District Council is not making sufficient allocations to meet their own assessment of objectively assessed housing need. This is unsound; the plan is not positively prepared and not adequately justified. (This is covered in our most recent representations on the Further Proposed Changes in September 2014)

## Appendix A to Matter 3 Spatial Strategy ID ref 797

### PEGASUS GROUP COMMENTS ON MAIN AREAS OF DISAGREEMENT

#### **A) The level of new jobs to be expected in the area;**

As set out in our representations, we have taken a conservative approach to our forecasting by taking the midpoint between economic projections provided by Cambridge and Oxford Econometrics. Pegasus identified an increase of 10,500 jobs based on two economic sources over the plan period compared to PBAs prediction of 2,300 jobs. (FPC 3)

Since submission of the PBA SHMA, Experian have revisited the number of jobs projected to arise in the area. As a result the number of jobs has increased to 8,000 compared to the level of jobs predicted by the PBA SHMA.

Despite this significant increase in jobs the PBA model does not project any increase in households

#### **B) The extent to which the area needs to plan increased migration (over and above that proposed) to secure new jobs;**

As identified below and within representations, Pegasus has sought to provide for the projected increase in workplace growth within the HMA, which has resulted in additional net migration to get a balance of workplace growth to match the projection. As identified below, there is a difference between methodologies to achieve this.

#### **C) Whether the Council have dully considered 'market signals' in the assessment of housing need;**

Agree. As set out below and within representations, it is our view that market signals have been ignored by the Council in their assessment. There are a number of indicators that suggest the housing requirement should be adjusted. It is suggested by Pegasus that the existing unmet need should be provided for in order to help meet existing constrained need.

**PEGASUS GROUP COMMENTS ON THE CONTENTS OF THE PBA NOTE OF THE INFORMAL WORKING MEETING 20<sup>th</sup> October 2014 (note circulated Thursday 23<sup>rd</sup> October 2014)**

<b>Pegasus Group</b>		
<b>Meeting Objectives</b>	<b>Agree</b>	<b>Disagree</b>
<b><i>The OAN starting point</i></b>		
<p>a. 2012 Based Projection;</p> <p>b. Translated to households using PBA 'blended HRRs';</p> <p>c. So imply 554 dpa for the Plan area.</p>	<p>a. Agree</p> <p>c. Agree that the different approach taken by PBA and Pegasus to HRRs would have a small impact on overall number of dwellings projected;</p>	<p>b. PPG suggest adjustment to HRR (to reflect 2008-based rates of change) should take place from 2016 onwards (5 years earlier) due to improving economy as set out in representations;</p> <p>c. Disagree that there is a need for 554 dpa for the plan area. Pegasus suggest the starting point must be 670 dpa for the plan area, which includes providing for unmet need.</p>
<b><i>Agree the past Population</i></b>		
<p>a. Natural change is negative;</p> <p>b. Population growth is driven almost entirely by inward migration;</p> <p>c. Net migration fell in the recession;</p>	<p>a. This is true cumulatively from 2001 to 2013;</p> <p>b. Agree</p> <p>c. Generally, yes. Migration was suppressed through lack of dwelling completions and contracting economy</p>	<p>a. For W&amp;P natural change between 09-11 was positive</p>
<b><i>Agree the past jobs</i></b>		
<p>d. The area grew total jobs in the past – 10 years (01-11):</p>	<p>d. Agree.</p>	

<p>a. Total jobs grew by 9,650;</p> <p>b. FTE grew by 4,250;</p> <p>c. Therefore some of the jobs were part time (source Experian September 2014).</p>	<p>a. Census identifies a change in workplace population of 10,657 between 2001 and 2011 for the HMA</p> <p>b. Census does not provide FTE figures</p> <p>c. Agree that some job growth is accounted for by part time jobs. There was also an increase in full time jobs across the HMA. This is to be expected and in line with regional and national trends.</p> <p>Appreciate that total jobs include both FT and PT jobs. The Chelmer Modelling work in achieving work place growth projections (as opposed to labour force projections) identified by economic forecasters, therefore, assumes existing commuting and FT/PT ratios are maintained.</p>	
<b><i>Agree the past for labour market balance</i></b>		
<p>e. The Census shows that the HMA moved from a labour market imbalance (2001) – where more people commuted out than in – to broadly nil net commuting (2011). So at 2011 the labour market was broadly balanced.</p>	<p>e. Agree at HMA level.</p> <p>At 2001 the HMA was a major net exporter of labour with 5,013 people commuting out of the HMA to work. At 2011 the HMA is a minor exporter of labour with 1,927 people commuting out of the HMA to work.</p> <p>At 2011 11,016 people commute in to work whilst 12,943 commute out.</p>	<p>e. Disagree that HMA is the only geography we need to look at.</p> <p>There is a significant imbalance at district level.</p> <p>At 2001 West Dorset was a minor net importer of labour with 2,639 people commuting into the district to work. At 2011 West Dorset is now a major importer of labour with 6,620 people commuting into the district to work;</p> <p>At 2001 Weymouth was a major exporter of labour with 7,652 people commuting out of the district to work. At 2011 Weymouth continues to be a major net exporter of labour with 8,547 people commuting out of the district to work;</p>

<p>f. Although the HMA labour market is broadly balanced:</p> <p>a. There are strong commuting flows between the two districts;</p> <p>b. More residents commute out of Weymouth &amp; Portland to West Dorset than the other way;</p> <p>c. There are gross flows between the HMA and neighbours.</p> <p>g. Changes in commuting patterns (since 2001) will have helped support past job growth in the HMA.</p>	<p>a. Although the degree of net out commuting from the HMA has decreased between 2001 and 2011, the numbers of people commuting from Weymouth &amp; Portland to West Dorset for work has significantly increased. The imbalance between jobs and workers within the two districts is significant and worsening.</p> <p>b. 8,355 people commute out of Weymouth &amp; Portland each day to work in West Dorset. This has increased since 2001.</p> <p>c. A significant number of people commute out of the HMA to work in Purbeck (2,285), North Dorset (1,065), Poole (1,114), and South Somerset (3,879).</p>	<p>g. Increase in jobs likely to have driven the decrease in net out commuting from the HMA rather than the other way around.</p>
<b>HRRs</b>		
<p>a. The use of the 'blended' HRR used by PBA is reasonable;</p> <p>b. Pegasus suggest reverting to 2008 rates of change 5 years</p>	<p>a. Agree that the blended approach to HRR's is reasonable;</p> <p>b. For the reasons set out within the Housing Evidence Base Review Paper, it is considered that there are a</p>	<p>a. Disagree that the blended approach should apply from 2021 onwards. This will assume pessimistic household growth for the majority of the plan period.</p>

<p>earlier than PBA;</p> <p>c. The two approaches make little material difference.</p>	<p>number of indicators suggesting the housing market is returning to previous trends sooner than anticipated. It is appropriate that future housing requirements reflect this.</p> <p>c. It is agreed that there is little material difference when considered in isolation. however,</p>	<p>c. When considered cumulatively with other factors the difference may be material.</p>
<p><b>Households to dwellings</b></p>		
<p>a. There are two approaches to conversion used in the reports – Census and Council Tax. The difference between the two is very small and so unlikely to be material.</p>		<p>a. The difference may be minimal, however, it is fundamentally wrong to use Council Tax records to identify vacant and second homes as this source does not accurately reflect the true position.</p> <p>For example, householders may choose to identify a property as a business and therefore pay business rates instead of Council Tax. Given that the Census data was collected reasonably recently it is considered to be a reliable source for identifying an appropriate conversion rate from households to dwellings.</p> <p>If an allowance for vacant and second homes is not provided for, this will ultimately disadvantage those on lowest incomes and possibly prevent their formation as a household within the HMA.</p>
<p><b>Migration profiles</b></p>		
<p>a. The PBA 01-07 projection uses the profile of migration from the 01-07 period. This profile assumes a slightly younger migration profile than used by others.</p>	<p>a. It is agreed that a slightly younger migration profile is likely develop as a consequence of economic led migration;</p>	<p>a. However, given the population profile arising from more recent trends it is suggested that a blend between boom and bust time is adopted</p>

<p>b. Objectors use 07-12 profiles. This profile is slightly older than that used by the Council.</p> <p>c. The end result is that for any given number of jobs more new homes are needed using the objectors assumptions than the Council's.</p> <p>d. See PBA spreadsheet for comparing migration flows and profile.</p>	<p>b. Agree. This is the profile emerging from the most recent data;</p> <p>c. Agree. There is concern, however, that the LPAs approach may under provide for the ageing migrants that are more likely to have greater disposable income and therefore those less well-off will be disadvantaged.</p> <p>d. As above.</p>	
<b>Market signals and previous housing targets: The Former Structure Plan</b>		
<p>a. The SP ran from 1994 – 2011;</p> <p>b. It provided for net 247 dpa for W&amp;P and 529 for WD (776) and gross 276 dpa and 559 dpa gross (835);</p> <p>c. Over life of SP the HMA delivered 91% of SP target i.e. between 1994 – 2011;</p> <p>d. By district most of the SP deficit was related to West Dorset (W&amp;P broadly met SP 97% and WD achieved 89%);</p>	<p>a. Agree</p> <p>b. Agree. As confirmed by paragraphs 6.23 6.24 and 6.40 of the Structure Plan the housing targets contained in the SP were supply led figures (as opposed to representing the level of objectively assessed market demand or need) which represented a <i>“significant reduction in building rates compared with those of the past”</i>.</p> <p>c. Agree. A shortfall of 1,233 against a supply led target.</p> <p>d. Agree. A shortfall of 1,079 in WD and 155 in W&amp;P against a supply led target.</p>	

<p>e. Before 2006/07 97% of the SP was met and majority of the SP shortfall occurred since the 'credit crunch' in 2007;</p> <p>f. Over the period used by the Council to project their trend 01-07 the SP target was slightly exceeded;</p>	<p>e. Agree. At 2006 there was a shortfall of 218 in WD and 42 dwellings in W&amp;P against a supply led target.</p> <p>f. Taking the period 2001-2007 in isolation the supply led target was marginally exceeded by 29 in WD and 169 in W&amp;P.</p>	<p>f. However, taken cumulatively since the start of the plan period there was an overall shortfall of 520 dwellings in the HMA by the start of 2001. By 2007 this cumulative shortfall was still 322.</p>
<p><b>Market signals and previous housing targets: Past delivery compared to the 775 target</b></p>		
<p>a. The proposed target of 775 dpa is higher than past delivery in a reasonably long term past (2001/11 or 2001/14 it makes no difference);</p> <p>b. But 775 dpa is slightly lower than past delivery in 2001/07;</p>		<p>a. Whether the proposed target is higher than average delivery over the past is meaningless if delivery over the past has been suppressed below actual needs.</p> <p>The Structure Plan target, which was a supply led target (below actual housing needs) has not been met.</p> <p>b. As above.</p>
<p><b>Market signals and previous housing targets: 'Uplift' and Market Signals</b></p>		
<p>c. The Council should not plan only to meet the most recent demographic projections and an uplift compared to ONS 2012 is warranted;</p> <p>d. But there is disagreement about the scale and scope of this uplift.</p>	<p>c. 775 dpa is lower than the supply led Structure Plan target of 834 dpa. The SP target was a restraint adjusted figure which was not informed by housing need or demand.</p> <p>a. Agree that uplift should be included in order to respond to market signals identifying additional need above and beyond demographic requirements.</p> <p>It is proposed that an allowance for unmet need to provide for those concealed, shared and homeless</p>	

	households that have arisen from lack of previous dwelling provision.	
<b>Economic activity rates</b>		
<p>a. The ONS no longer provides projections of future economic activity rates (post 2021);</p> <p>b. In the absence of official projections both PBA and Turley have made allowances in their modelling work for changing future economic activity rates including adjustments related to increases in state retirement age;</p> <p>c. Nexus and Pegasus have made no changes to economic activity rates.</p>	<p>a. Agree;</p> <p>b. Agree.</p> <p>c. Agree. Although it is recognised that the change in state retirement age is likely to increase activity rates. There is no evidence to quantify the extent of the change and therefore Pegasus has sought to identify the worst case scenario.</p>	
<b>Employment forecasts</b>		
<p>a. All parties have agreed to share their economic forecasts as a matter of urgency;</p> <p>a. PBA have provided the baseline data used in their Summer 2014 report;</p> <p>b. PBA have also provided additional work</p>	<p>a. CE and OE data used within the Chelmer Model is included within the Housing Evidence Base Review Paper. Unlike Experian, other related data such as FT/PT breakdown is not provided as an output.</p> <p>CE employment projections are not constrained by population/ labour supply and are based on the assumption that historical relationships between growth in the local area relative to the region or UK (depending on which area that industry has the</p>	

<p>undertaken by Experian following representations;</p> <p>c. PBA provided a detailed breakdown of how the Experian model sources its future labour force demonstrating how the model makes a number of relevant demographic assumptions;</p> <p>b. Similar data is awaited from Nexus (Oxford) and Cambridge (Pegasus). Turleys use Experian (so additional forecast data is not required).</p>	<p>strongest relationship with), on an industry by industry basis, continue into the future. Therefore, no explicit assumptions for population and activity rates are in the model.</p>	
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