

Dorset CPRE calls for a truly Local Plan

Dorset needs a Local Plan that meets the needs of local people, communities and businesses. Dorset has to avoid a developer-led free-for-all and so needs a Plan in place by 2024, as the government requires. But that plan should be credible, reflect local need and be based on full consultation with communities, businesses and local people. The plan should offer local homes for local people, including truly affordable homes. And it should respect and protect Dorset's environment, our greatest economic asset. The future health of everyone as well as our economy depends on this.

A genuine consultation?

The consultation should identify the key issues facing the county, invite views on local housing needs and more generally on what the local plan should contain (as required in Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012). Does the Dorset Council consultation do this? Does it present a range of options on the key issues? Or does it, as some think, offer a narrative with limited options? Some note for example the following statement:

"In the central Dorset functional area housing growth will be delivered: at the county town of Dorchester, including through major urban extensions at Poundbury and North of Dorchester; at the major coastal resort of Weymouth, including through town centre regeneration and a major urban extension at Littlemoor;" etc

This hardly looks like a consultation with a range of options on which views are sought.

By comparison, Dorset's neighbours Bournemouth, Christchurch & Poole (BCP) and East Devon District Council have both issued consultation documents. The message from East Devon states:

"I am delighted to advise that we are producing a new local plan for East Devon. To start things off we have produced an Issues and Options consultation report. This report highlights some of the major planning issues and challenges that we see for East Devon over the years ahead and some of the potential responses. We would welcome your views on the matters we raise or any additional considerations.

This consultation is undertaken in respect of the requirements of 'Regulation 18' of 'The Town and Country Planning (Local Planning) (England) Regulations 2012' <https://www.legislation.gov.uk/uksi/2012/767/regulation/18/made>"

For Dorset, with its exceptional landscapes, wildlife and heritage, the assessment of wide-ranging environmental issues is of great importance. The environment is Dorset's greatest economic asset, and everyone's future health and livelihood depends on this. Many will want to ask whether the proposed Local Plan is compatible with Dorset Council's declared climate and nature emergencies and zero

carbon commitments. The Council has only recently published a complex Sustainability Appraisal.

The consultation appears to be rushed and does not give people the necessary time to consider, consult and comment on these and other important questions.

Housing numbers

Consulting on the appropriate level of housing to meet local need is particularly important since it is these numbers that drive the developments identified for communities across Dorset. Should the Local Plan accept the central housing targets used by Dorset Council, or should there be a local assessment of housing need?

Last June, an independent report for Dorset CPRE by ORS (1) showed that the Dorset Council and BCP Council could be forced to plan for excessive numbers of new housing. The key findings were that:

- Central government's housing targets are 47% higher than the existing Local Plans in Dorset.
- The government's housing targets are way in excess of any sensible forecast of local housing need.
- The Government's targets and algorithm are based on outdated and flawed population and household projections.
- Local authorities should encourage the development of suitable affordable housing for younger households.
- The report proposes that Dorset's local authorities should be prepared to challenge the central housing targets.

The threat of inappropriate and excessive developments that many communities fear is the result of the central housing targets which the Dorset Council is not consulting on. The argument that these housing numbers have to be accepted is not correct. National planning policy (the NPPF) states that a local housing need assessment should be based on the central standard method unless exceptional circumstances justify an alternative approach. In the case of Dorset over 50% of the county is within AONBs, many areas are in the Green Belt, while other environmental designations recognise the exceptional quality of Dorset's landscapes and wildlife. Dorset's infrastructure also places constraints on substantial developments. For example, some river catchments and harbours are already polluted, limiting further scope for development without remedial action.

Other areas of the country have successfully argued that central housing targets are inappropriate for their Local Plans (see the Annex).

The danger of a failed Local Plan

If the Dorset Local Plan does not reflect local need, then there is a danger it could fail, resulting in the developer led free-for-all that a Local Plan is designed to avoid. If unrealistic housing targets are set, then the houses might not be built (why would a developer build houses for which there is no demand), the land for such developments would not be brought forward (why would landowners and developers

bring forward land that will not be built on) and the Local Plan would then fail the 5 year land supply test.

The central housing targets are unrealistically high not least because the central algorithm increases assessed local housing need by 40% to reflect high house prices. The apparent justification for this increase in numbers is that if you build more, then prices will come down. But the housing market is not like the coffee bean market where prices relate to coffee bean supply. In some areas of Dorset developers could build houses that would be snapped up as investment properties, second homes or holiday lets. Building more does not inevitably lead to lower prices. Nor would it necessarily address the need for suitable homes, including affordable one and two bedroom accommodation for young people and some not-so-young retirees across Dorset. Developers prefer to build the houses that will enable them to make the most profit. These are not necessarily the homes local people need.

Dorset CPRE supports the proposal for a Dorset National Park which would, amongst other benefits, enable the Dorset Council to partner with the Dorset National Park to establish a local assessment of housing need in place of the current central housing targets which underlie the draft Dorset Council Local Plan. This local assessment would cover the whole of the Dorset Council area. National planning guidance enables the use of a local methodology to assess housing need and numbers, where a local planning authority (in this case the Dorset Council) shares its area with a National Park. But the Dorset Council need not wait for a Dorset National Park before it undertakes that local assessment of genuine housing need.

Conclusion

Dorset CPRE wants to work constructively to help the Dorset Council develop a sound plan which meets the needs of our communities and helps them to thrive sustainably. We need a Local Plan that is based on full consultation with the people of Dorset on the issues and options that will shape our future. This includes the key issue of housing need and numbers. Central housing targets put at risk our communities and environment. We should all want a Local Plan to reflect genuine local housing needs and for the Dorset Council to be ready to justify a Dorset based approach to the planning inspectorate at public examination. Other councils have successfully made the case for locally appropriate housing numbers below central targets. Dorset needs a Local Plan that is achievable, deliverable and reflects and responds to local need. It is in the interests of the Dorset Council as well as all Dorset's communities, businesses and residents that a locally relevant and achievable Local Plan is developed.

Dorset CPRE
February 2021

Notes

- (1) For the ORS report see <https://dorset-cpre.org.uk/news/current-news/item/2250-dorset-housing-needs-evidence-report-june2020>
- (2) For the CPRE Press Release on the Dorset Local Plan see <https://dorset-cpre.org.uk/news/current-news/item/2268-dorset-cpre-slams-local-plan>

(3) For the National Planning Policy Framework (NPPF, para 60) see:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Annex

There are various examples of where adopted Local Plan housing numbers are based on a local housing needs assessment which is lower than the central target derived from the government's "standard method". The following lists some examples:

	Date adopted plan	Adopted number	LHN based on standard method
Adur	2017	177	453
Birmingham	2017	2555	3577 CD5.28 - GBBCHMA Housing Need and Land Supply Position Statement (September 2018) Birmingham City Council
Bedford	2020	970	1345
New Forest	2020	521	997
Thanet	2020	857	1117

A planning inspector has approved changes to Guildford Council's local plan after accepting that the 2016-based household projections justified a reduction in the local authority's housing target by more than 10 per cent.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.