

# DORSET COUNCIL LOCAL PLAN CONSULTATION, JANUARY – MARCH 2021

RESPONSE FROM DORSET CPRE  
MONDAY, 8 MARCH 2021



## Executive Summary

The following summarises the basis for Dorset CPRE's objections to the draft Dorset Council Local Plan. It includes suggestions for key changes and actions that we believe Dorset Council should consider, in order to produce a truly sustainable and inspiring Local Plan that has the environment and the community's interests at its heart.

The Local Plan sets out the key characteristics of the county. These very much reflect our rich built and natural environment.

It also goes on to express the key issues facing our area – some of which are difficult to predict, and even more difficult to control through planning interventions.

There is much to be admired in the vision – but what is not clear is whether the plan's proposals will safeguard our area's key characteristics and address the issues that have been identified. The actual proposals in the plan appear very similar to those of previous drafts and previous decades, but propose to increase the pace of development, without actually addressing the key issues that have been identified.

A key concern is that the plan is encouraging excessive growth, at the expense of the environment.

The Government-derived target of 30,481 dwellings over 17 years does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area. The Council has not examined in any detail how this figure relates to local housing need, nor how the protection of Dorset's environment and natural capital, its ecological and heritage assets might be impacted by this level of growth.

Furthermore, the Council is looking to allocate greenfield sites to deliver an extra 9,000 houses above this target, on the basis that there 'could' be an unmet need elsewhere or delays in delivery. In the Council's webinar, the possible need from the Bournemouth, Christchurch and Poole conurbation was specifically mentioned, because they have yet to produce their draft plan. Yet this need has not yet been substantiated, and pushing it out to Dorset may not be the most effective or sustainable strategy.

A key issue identified in the plan is high house prices and low wage levels, which result in our younger generations migrating out of the area. Simply building more houses is unlikely to fix this issue. There needs to be greater focus on delivering affordable housing through more imaginative methods, and the creation of better-paid jobs, and linking the two together.

The impacts of the COVID-19 pandemic and changes in the way we live and work should be considered now, and not left to a future review.

The environment is Dorset's greatest economic asset, and everyone's future health and livelihood depends on this. The protection of the environment should be at the very heart of the Local Plan, yet the proposals underpinning the strategy fail to respect Dorset's exceptional landscapes, wildlife and heritage.

Dorset Council declared a climate and ecological emergency, and whilst the plan talks about reducing car-borne travel patterns, we need to think more holistically about the priorities for investment and building.

There has been little in the way of community involvement in formulating the options that have shaped the plan.

The rushed timetable reinforces the perception that there is unlikely to be any appetite to make substantial changes. Few of the proposals are presented as genuine 'options', and it is difficult at best to understand what else have been considered and why it was rejected. All of this places communities at a disadvantage in evaluating and responding to the proposals and considering what the alternatives might be better.

There is also insufficient recognition of, or respect for, Neighbourhood Plans, into which communities have invested great time, care and commitment.

The draft plan is not easy to understand, and is largely presented as a 'fait accompli'. It, and much of the supporting evidence, is lengthy and poorly summarized.

Whilst the Council took the decision in June 2019 to commence work on the combined plan, there has been a very patch-work approach to creating a robust and comprehensive evidence base, particularly in terms of how the area and its infrastructure functions. Where evidence has been collated, it is often inadequate in its scope, and there is no clarity about what work is pending and when this may be produced.

#### Suggested way forward:

- i) The Local Plan should include a section or table explaining how each of the key issues identified in the plan are being addressed, either through the Local Plan or through other plans or programmes (and if so, what). This should help clarify what fundamental changes to the Plan are needed.
- ii) Dorset Council should research local housing needs to establish the type and amount of housing that is needed in the area, in terms of addressing local needs for housing, and how this might differ from the standard methodology.
- iii) Dorset Council should openly engage with the adjoining authorities and publish in a timely fashion the evidence underpinning any notion of unmet housing need that can be properly scrutinised. Given that Dorset Council's Local Plan is already proposing the release of Green Belt land, it would appear reasonable for the Council to state that Dorset too faces challenges in terms of meeting its own housing needs and would not offer to accommodate the unmet need from the conurbation.
- iv) There should be no expectation for Dorset Council to exceed its housing target, and further consideration should be given as to whether the housing needs can be met in full given the environmental constraints. Sites that would not contribute towards sustainable development should be removed from the plan.

- v) A clear strategy is needed in terms of the provisions to be made for supporting rural communities and our market towns, that does not rely on large and unsustainable housing sites on greenfield land, and that has considered and anticipated the likely economic challenges in light of the COVID-19 pandemic, Brexit and the Council's declared climate and ecological emergency.
- vi) Dorset Council should reassess its approach to site allocations to give greater priority to avoiding harm (rather than accepting harm on the basis that it may be able to offset this through mitigation or compensation measures).
- vii) It should refocus the assessments in the sustainability appraisal that deal with climate change, to ensure proper consideration is given to carbon consumption and opportunities for carbon sequestration.
- viii) It should also look to pioneer the requirements for Net Biodiversity and Carbon Gain from all developments within the Local Plan.
- ix) Dorset Council should revise its programme for progressing the Local Plan in order to provide a further opportunity for communities to express clearly (1) what level of growth and supporting infrastructure could be beneficial to those communities (2) the extent to which they may wish to take a lead identifying sites to meet any such needs through Neighbourhood Plans.
- x) The repetition in the plan needs to be reduced and the plan should focus more on explaining its proposals for Dorset. Where policies are simply reiterating national policy, there is little need for lengthy introductions and justification.
- xi) The evidence on which the plan and sustainability appraisals are based should be clearly signposted from within those documents.
- xii) Evidence over 20 sides of A4 should include an executive summary so that it is clear to the reader what the report covers, the basis of the research and the main conclusions reached.
- xiii) Dorset Council should as a matter of expediency publish a comprehensive list of what other work is pending and when this may be produced, and allow further responses to the consultation at that time and prior to publishing the final draft of the plan. Where the Council is intending to rely on developer-produced reports this should be made clear.
- xiv) All documents, including background papers, should be critically reviewed for consistency, clarity and to ensure that they are based on sound and joined-up evidence which is clearly explained and set out within that report. The reports should be dated and the authors (and their qualifications) credited.

## 1. DORSET'S KEY CHARACTERISTICS

*The Local Plan sets out the key characteristics of the county. These very much reflect our rich built and natural environment.*

1.1 The key characteristics of the County as referenced in its introduction are its predominantly rural nature, its beautiful collections of landscapes and coast, many of which have been given national if not international renown through literature, TV and film, and its very rich heritage. It is also relatively remote, with limited rail connections and no motorways, and most of its incoming population are retirees.

*It also goes on to express the key issues facing our area – some of which are difficult to predict, and even more difficult to control through planning interventions.*

1.2 The Council lists the key issues as:

- **climate and ecological emergency** (linked to global warming, the fragile nature of the natural environment, coastal erosion of flooding)
- **high reliance on car travel** (linked to lack of public transport services or rail connections)
- **high house prices, low wage levels and ageing population** (linked to lower-skilled occupations like farming and tourism that are associated with the rural and coastal nature of the area, and net out-migration of younger people (particularly aged 20-29 years) and in-migration of retirees)
- **uncertainty over the future of our town centres** (linked to national changes in shopping habits (and COVID-19), relaxation of permitted development rights that would otherwise restrict changes of use)
- **increasing importance of broadband to the economy** (whilst 90% of Dorset's households currently have a superfast connection, there are still areas which do not)
- **increasing physical and mental health problems**, particularly among people on lower incomes (these are particularly notable in areas of deprivation (the 2019 IMD<sup>1</sup> suggests this is mainly focused within the larger urban areas))

*There is much to be admired in the vision – but what is not clear is whether the plan's proposals will safeguard our area's key characteristics and address the issues that have been identified. The actual proposals in the plan appear very similar to those of previous drafts and previous decades, but propose to increase the pace of development, without actually addressing the key issues that have been identified.*

### Suggested way forward:

- i) The Local Plan should include a section or table explaining how each of the key issues identified in the plan are being addressed, either through the Local Plan or through other plans or programmes (and if so, what). This should help clarify what fundamental changes to the Plan are needed.

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<sup>1</sup> [http://dclgapps.communities.gov.uk/imd/iod\\_index.html#](http://dclgapps.communities.gov.uk/imd/iod_index.html#)

## 2. HOUSING NUMBERS AND THE SPATIAL STRATEGY

*A key concern is that the plan is encouraging excessive growth, at the expense of the environment.*

*The Government-derived target of 30,481 dwellings over 17 years does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area. The Council has not examined in any detail how this figure relates to local housing need, nor how the protection of Dorset's environment and natural capital, its ecological and heritage assets might be impacted by this level of growth.*

2.1 The Dorset CPRE Housing Needs Evidence report<sup>2</sup>, highlighted the inherent problems with using the population projects (for both rural Dorset and Bournemouth, Christchurch, and Poole (BCP)) because of the level of unattributable population changes inherent in the calculations and growth in student numbers and how this has been dealt with in the calculations.

2.2 Whilst house prices and rental levels have been increasing nationally, in Dorset overall house prices remain lower in 2018 than they were at the peak of the market in 2007/08 (after taking account of inflation) and there has been little change in monthly rents across the county between 2011 and 2018. This suggests that the number of new homes provided during this period was sufficient to meet most housing need in full, including needs arising from net migration. The proposed growth (an uplift from 1,090 dwellings per annum broadly averaged from 2011-2018 up to 1,793 dwellings per annum, an increase of 64.5%) is simply not justified when examining the underlying data.

2.3 Whilst the Government do not consider it appropriate to use the more recent population projections<sup>3</sup>, they do make clear that the number derived from the standard methodology is the "starting point" for plan-making, and that there may be good reason why that level of need cannot be met in full. The Government's response to the most recent consultation<sup>4</sup> on housing numbers (dated 16 December 2020) states that this number should be considered alongside the environmental constraints for the area (of which there are many in Dorset):

*"Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately*

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<sup>2</sup> As previously sent to Dorset Council and available on the Dorset CPRE website <https://dorset-cpre.org.uk/resources/item/2252-dorset-housing-needs-evidence-report>

<sup>3</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>  
NPPG 015 Reference ID: 2a-015-20190220

<sup>4</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

*located. In doing this they should take into account their local circumstances and constraints.”*

2.4 Whilst a plan is required to 'seek to meet' the area's objectively assessed needs, national guidance says that, in doing so, it must still be consistent with achieving sustainable development (NPPF para 35). Dorset is a particularly environmentally constrained area, and the standard method for calculating housing need has not taken this into account. Furthermore, the Plan makes no reference at all to the proposal for a National Park, which Dorset CPRE would wish to include as much as possible of rural Dorset and, subject to assessment, to align with the Dorset Council area.

*Furthermore, the Council is looking to allocate greenfield sites to deliver an extra 9,000 houses above this target, on the basis that there 'could' be an unmet need elsewhere or delays in delivery. In the Council's webinar, the possible need from the Bournemouth, Christchurch and Poole conurbation was specifically mentioned, because they have yet to produce their draft plan. Yet this need has not yet been substantiated, and pushing it out to Dorset may not be the most effective or sustainable strategy.*

2.5 In relation to the BCP area, the Government has specifically targeted the major cities / urban centres for an additional 35% uplift in their housing targets in the latest iteration of the Government's method for calculation housing needs. Whilst neither Bournemouth nor Poole were included in this higher tier group (as they were considered as separate areas), it is clear that the Government considers such large conurbations should attempt to meet their own housing needs if at all possible<sup>5</sup>.

2.6 Whilst it may appear laudable for Dorset to offer up its greenfield sites to assist the conurbation to deliver sufficient housing to meet its housing target, this should not be at the cost of Dorset's own environment. The New Forest District Council has finalised its Local Plan and isn't in a position to offer to help out BCP Council by taking some of its target number. Dorset Council should likewise decline to do so, given its environmental and other constraints.

2.7 Nor should the Council be held to ransom due to lack of delivery by the development industry. Dorset Council has not produced a housing trajectory as part of this draft plan, but lessons need to be learnt regarding the delays in delivering sites and the Plan should set out clearly the mechanisms it intends to use to avoid such problems recurring, rather than simply allocating more greenfield sites.

*A key issue identified in the plan is high house prices and low wage levels, which result in our younger generations migrating out of the area. Simply building more houses is unlikely to fix this issue. There needs to be greater focus on delivering affordable housing through more imaginative methods, and the*

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<sup>5</sup> NPPG Paragraph: 035 Reference ID: 2a-035-20201216 states that "the increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations" and that this is "to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable."

*creation of better-paid jobs, and linking the two together.*

2.8 The Dorset LEP's local industrial strategy<sup>6</sup> talks about the importance of the quality of the environment (and ways of living to enhance this environment) as a means of both realising and retaining local talent, supporting the One Health agenda and underpinning a cultural and digital-based economy across the whole of Dorset. It also talks about improved options for access to learning and training, and developing an approach that provides the physical and digital connectivity that broadens Dorset's geographic 'footprint-options' for new and growing businesses. However it is not clear what all of this means in terms of the Local Plan and the key changes the plan proposes to deliver this growth, particularly in rural areas where the falling numbers of young and working age population are generally more severe.

2.9 In short, the Plan's proposals for 21,000 jobs appear to be entirely unrelated to the proposals for 30,481 (and potentially as much as 39,285) homes or the functional areas in which they fall. The overarching policy on housing and employment fails to recognise the need for housing and employment (and infrastructure) to be delivered in a timely, coordinated manner – the delivery of one without the other leads to an unbalanced, unsustainable outcome.

*The impacts of the COVID-19 pandemic and changes in the way we live and work should be considered now, and not left to a future review.*

2.10 Since the development of the Local Plan, the COVID-19 pandemic has caused further economic and job uncertainty, with initial housing reports also indicating greater demand from those living in London and the cities to make a permanent move out to rural areas such as the South West in search of more space<sup>7</sup>. The previous Local Plans provided about 18% of all new homes as affordable (delivered by Housing Associations), with very few delivered in rural areas<sup>8</sup>.

2.11 The Local Plan (para 5.1.6) suggests that the economic implications of significant events such as the declaration of a climate and ecological emergency, Brexit and the COVID-19 pandemic have the potential to profoundly impact the local and wider economy are something to be considered in the future. Is the Council seriously suggesting that this is something for a future review? Surely now is precisely the right time to be considering how rural communities can be better supported through the Local Plan and other programmes, to set up Community Land Trusts and acquire land, and for Dorset Council itself to look to build Council Houses and business start-up units to provide the right foundations for the future.

2.12 The CPRE is also concerned that relying on large housing sites to deliver the house types that are genuinely needed puts greater strain on infrastructure, causes greater environmental impacts, sustains high housing land values and does little to address rural Dorset's actual needs.

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<sup>6</sup> <https://www.dorsetlep.co.uk/userfiles/files/LIS/Dorset%20Local%20Industrial%20Strategy%20-%20Draft%20.pdf>

<sup>7</sup> <https://www.rsnonline.org.uk/house-prices-rise-as-covid-19-sparks-rural-relocation> and <https://www.housing.org.uk/news-and-blogs/blogs/lord-best/rural-housing-pandemic-future/>

<sup>8</sup> The latest annual monitoring report for West Dorset, for example, shows 31 affordable homes built on rural exception sites in the last 3 years (averaging 10 homes a year), representing just 2% of all the homes built in that district.

Suggested way forward:

- ii) Dorset Council should research local housing needs to establish the type and amount of housing that is needed in the area, in terms of addressing local needs for housing, and how this might differ from the standard methodology.
- iii) Dorset Council should openly engage with the adjoining authorities and publish in a timely fashion the evidence underpinning any notion of unmet housing need that can be properly scrutinised. Given that Dorset Council's Local Plan is already proposing the release of Green Belt land, it would appear reasonable for the Council to state that Dorset too faces challenges in terms of meeting its own housing needs and would not offer to accommodate the unmet need from the conurbation.
- iv) There should be no expectation for Dorset Council to exceed its housing target, and further consideration should be given as to whether the housing needs can be met in full given the environmental constraints. Sites that would not contribute towards sustainable development should be removed from the plan.
- v) A clear strategy is needed in terms of the provisions to be made for supporting rural communities and our market towns, that does not rely on large and unsustainable housing sites on greenfield land, and that has considered and anticipated the likely economic challenges in light of the COVID-19 pandemic, Brexit and the Council's declared climate and ecological emergency.

### 3. THE IMPORTANCE OF DORSET'S ENVIRONMENT

*The environment is Dorset's greatest economic asset, and everyone's future health and livelihood depends on this. The protection of the environment should be at the very heart of the Local Plan, yet the proposals underpinning the strategy fail to respect Dorset's exceptional landscapes, wildlife and heritage.*

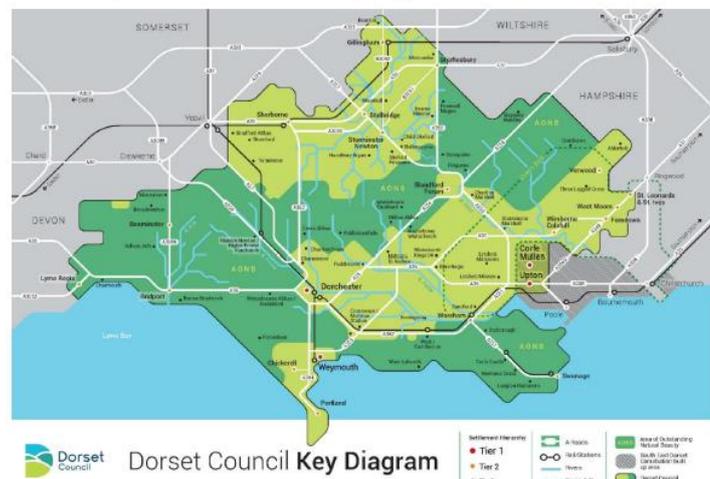
Dorset CPRE commissioned a report on the evidence for rural Dorset's potential for National Park status<sup>9</sup>, and this was presented to Dorset Council, including the Portfolio Holder for Planning, in July 2019. This concluded that there is extensive evidence that can be called upon to consider the four key attributes that would underpin a potential case for a National Park for rural Dorset (its natural beauty, breadth of cultural heritage, wildlife importance and recreational opportunities). These attributes are in no way limited to the two Areas of Outstanding Natural Beauty or coastal areas. The report highlighted the unique opportunity for the Council to review what evidence is collected across the various departments and how (including cooperative working with the Local Enterprise Partnership and Local Nature Partnership).

3.1 National planning policy (NPPF paragraph 2.11) specifies a number of factors that can provide strong reasons for restricting the overall scale, type or distribution of development in an area:

- habitats sites (Special Areas of Conservation, Special Protection Areas, Ramsar sites, any relevant Marine Sites, Sites of Special Scientific Interest and sites identified, or required, as compensatory measures for adverse effects);
- land designated as Green Belt;
- land designated as Local Green Space;
- Areas of Outstanding Natural Beauty and National Parks;
- Heritage Coast;
- irreplaceable habitats (including ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen);
- designated heritage assets;
- non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments;
- areas at risk of flooding or coastal change.

3.2 However, from the spatial strategy diagram, it could be inferred that only the AONB and Green Belt are considered to be significant constraints impacting on the area.

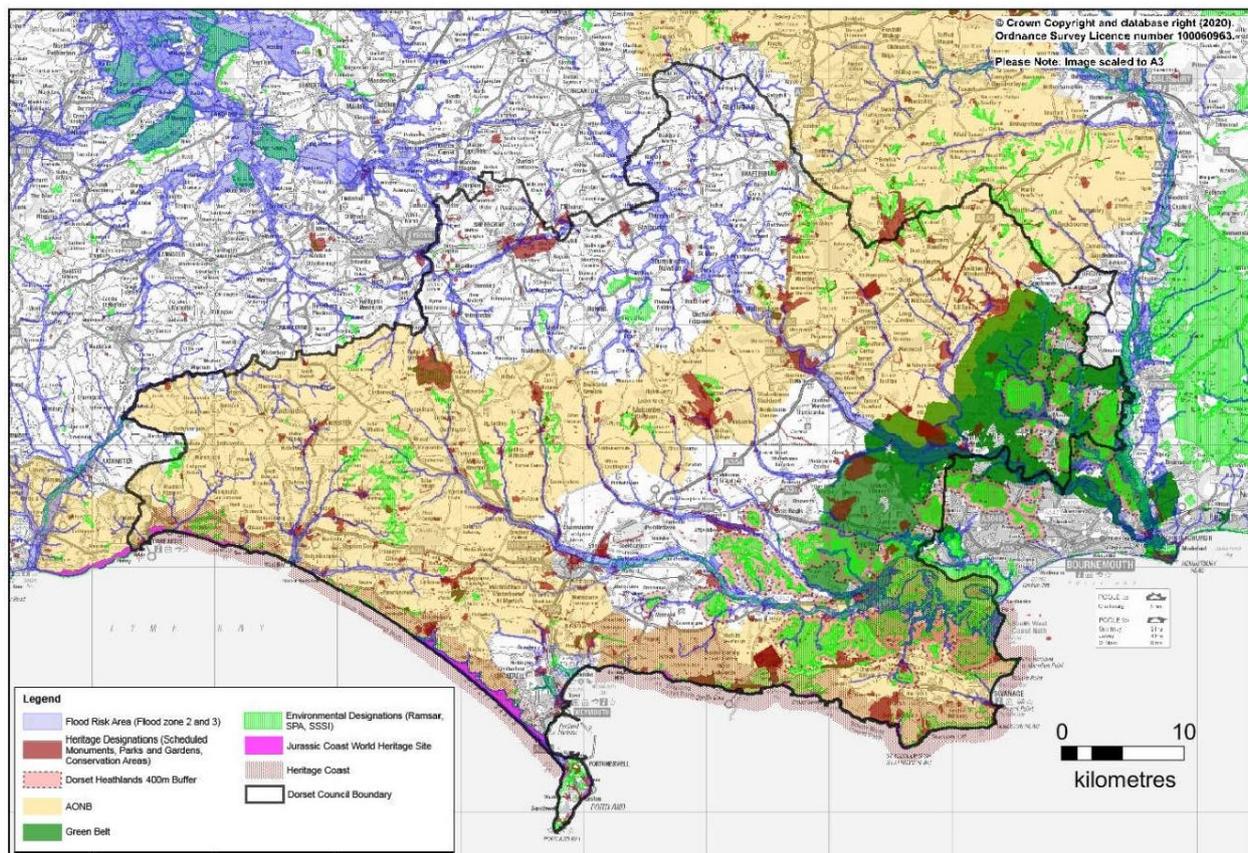
Figure 2.5 – Dorset Council Local Plan strategic diagram



<sup>9</sup> A National Park for Dorset - Considering the case for Rural Dorset - The Evidence <https://dorset-cpre.org.uk/resources/item/2253-evidence-for-dorset-national-park>

3.3 Whilst Figure 1.2 of the Local Plan includes the majority of the constraints listed in the NPPF, and begins to illustrate the degree of environmental constraints that potentially limit development areas, it is not fully comprehensive. It does not include: sites identified, or required, as compensatory measures for adverse effects on habitats sites (such as the SANGs and land off-setting the nitrates issues for Poole Harbour); the Local Green Space designations (albeit these are by definition not extensive in character); irreplaceable habitats (that are not already designated SSSIs); Listed Buildings and non-designated archaeological sites of equivalent significance to scheduled monuments. Whilst there may not be a comprehensive database of all of these factors (for example the importance of archaeological sites may remain unknown until such time they are investigated) it would be possible to map the known constraints where these have been identified (for example the ancient woodland inventory held by Natural England) and this is important not only for the Local Plan but also in relation to determining planning applications.

Figure 1.2: The Dorset Council area and its main environmental constraints



3.4 Despite the extent of environmental constraints and the acknowledged importance of the environment in the future economic success of the county, the proposed over-supply of site allocations includes sites that will adversely impact on these key constraints.

3.5 The Plan proposes major development of more than 3,500 houses to the north of Dorchester that will impact on a sensitive and important historic and cultural landscape and lead to an increase in car-borne traffic, major developments in South East Dorset that will seriously impacting on the Green Belt, and major developments in the Dorset AONB (Vearse Farm in Bridport would be the largest development in any AONB in England and Littlemoor in Weymouth). Proposals for 1,230 houses for Sherborne will have adverse impact on the areas designated as being of Local

Landscape Importance, the setting of the Historic Abbey Town and further erode the fragile gap between it and Yeovil.

3.6 All of this reinforces the point that the Local Plan gives insufficient recognition of or respect for Dorset's exceptional landscapes, wildlife and heritage.

*Dorset Council declared a climate and ecological emergency, and whilst the plan talks about reducing car-borne travel patterns, we need to think more holistically about the priorities for investment and building.*

3.7 Professor Dieter Helm<sup>10</sup>, in his research, addresses the actions we all need to take to tackle the climate emergency. In his most recent publication, Net Zero, he examines lessons from the COVID-19 pandemic and explains how we need to shift our emphasis from reducing carbon emissions to reducing our carbon consumption. This means challenging some of the assumptions about growth. It also means that, where consumption is justified, it should focus on using local materials and production to reduce the need to import goods and products from less carbon-regulated countries. And it means prioritising fibre infrastructure above roads, and ensuring that the environment on our doorstep is rich in its biodiversity and carbon sequestration. To this end, he advocates that we should take the ideas imbedded in Net Biodiversity Gain a step further, to require a Net Carbon Gain from developments. The Dasgupta Review<sup>11</sup> includes similar themes, such as the need to change our consumption and production patterns, avoiding degradation of nature as a priority, habitat restoration and creating sustainably productive lands and seas.

#### Suggested way forward:

- vi) Dorset Council should reassess its approach to site allocations to give greater priority to avoiding harm (rather than accepting harm on the basis that it may be able to offset this through mitigation or compensation measures).
- vii) It should refocus the assessments in the sustainability appraisal that deal with climate change, to ensure proper consideration is given to carbon consumption and opportunities for carbon sequestration.
- viii) It should also look to pioneer the requirements for Net Biodiversity and Carbon Gain from all developments within the Local Plan.

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<sup>10</sup> <http://www.dieterhelm.co.uk/>

<sup>11</sup> The Economics of Biodiversity: The Dasgupta Review, February 2021

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/962785/The\\_Economics\\_of\\_Biodiversity\\_The\\_Dasgupta\\_Review\\_Full\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf)

## 4. INVOLVING LOCAL COMMUNITIES IN PLAN-MAKING

*There has been little in the way of community involvement in formulating the options that have shaped the plan.*

4.1 The only recorded consultation on the Dorset-wide strategy appears to be the settlement hierarchy events held with Town and Parish Councils. And from the results it would appear that some of the key messages (such as the quality and frequency of public transport and lack of infrastructure) have not been further researched prior to drafting the plan. There was no engagement in terms of what each community considered to be the key issues and main needs that they wanted to address through the Local Plan and how they considered their area could contribute towards meeting the wider housing and employment needs, alongside the necessary infrastructure.

*The rushed timetable reinforces the perception that there is unlikely to be any appetite to make substantial changes. Few of the proposals are presented as genuine 'options', and it is difficult at best to understand what else have been considered and why it was rejected. All of this places communities at a disadvantage in evaluating and responding to the proposals and considering what alternatives might be better.*

4.2 Figure 2.6 in the draft Plan sets out the potential supply of new homes. Whilst the table header refers to these as 'option sites' the only locations where these appear to be optional are in relation to Alderholt, Wool and Gillingham.

4.3 Whilst in one of the webinars the fact that there are more homes proposed than required is explained as partly to ensure that there should not be a problem if some of the sites are taken out of the plan (for example as a result of the consultation), the potential option of fewer sites has not been conveyed as an option.

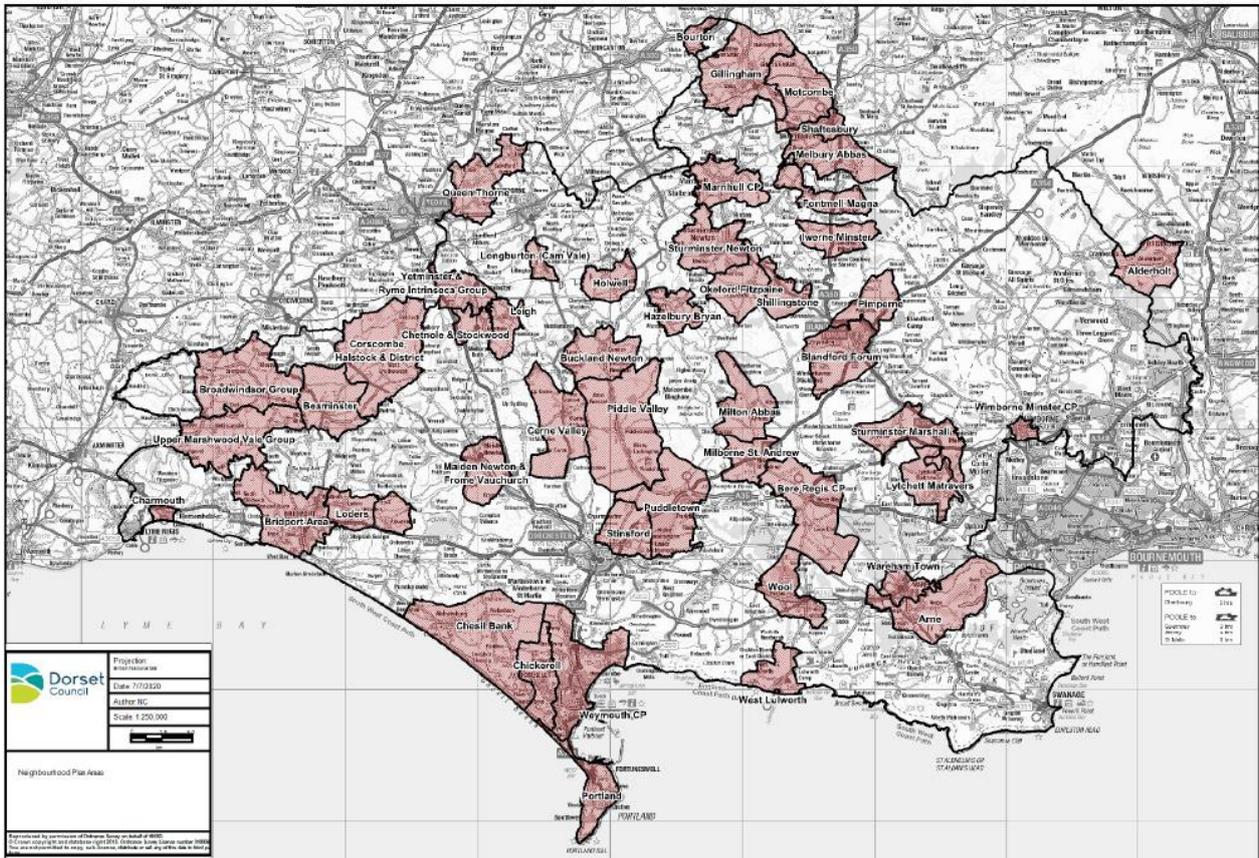
4.4 Under Figure 2.10 – Supply of Employment Land from Allocated Sites – there are no options given whatsoever.

4.5 There are no alternative options conveyed in relation to the scale of development in rural areas (and it is difficult to understand from the plan how much growth is suggested for the villages, even those ranked within Tier 3), and little explanation in the background paper as to how factors such as frequent and reliable public transport provision were actually measured for each settlement.

4.6 With the proposed timetable for the next iteration of the plan to be published this September, it is difficult to imagine that the Council is likely to make significant changes, and how the Council will be able to claim that the plan was "shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees" as required by national planning policy (NPPF 16(c)).

*There is also insufficient recognition of, or respect for, Neighbourhood Plans, into which communities have invested great time, care and commitment.*

4.7 There is extensive coverage of Neighbourhood Plan areas across Dorset, as shown in the following map. It is likely that further areas could still come forward to allow communities to more actively participate in planning for their area. In total there are currently 29 Neighbourhood Plan areas and 21 made plans, with a further six plans now scheduled to go to referendum in May this year. The first review of such plans has also been submitted for its examination.



4.8 Dorset Neighbourhood Plans have demonstrated the willingness of communities to identify sites to meet local needs in a sustainable fashion in a manner that is genuinely supported by local people. The following table provides examples of plans for villages that have allocated sites (where there was no set target in the Local Plan) and through examination (with Milton Abbas and Puddletown yet to go to referendum):

| NP area            | Functional area      | Tier   | Housing | Employment |
|--------------------|----------------------|--------|---------|------------|
| Bere Regis         | South Eastern Dorset | Tier 3 | 105     | ✓          |
| Broadwindsor       | Western Dorset       | Tier 3 | 59      | ✓          |
| Buckland Newton    | Central Dorset       | Tier 4 | 35      |            |
| Fontmell Magna     | Northern Dorset      | Tier 3 | 40      | ✓          |
| Hazelbury Bryan    | Northern Dorset      | Tier 3 | 13      | ✓          |
| Holwell            | Central Dorset       | Tier 4 | 4       |            |
| Milborne St Andrew | Central Dorset       | Tier 3 | 32      | ✓          |
| Milton Abbas       | Central Dorset       | Tier 3 | 22      |            |
| Motcombe           | Northern Dorset      | Tier 3 | 21      |            |
| Piddle Valley      | Central Dorset       | Tier 3 | 22      | ✓          |

|                      |                      |        |    |  |
|----------------------|----------------------|--------|----|--|
| Pimperne             | South Eastern Dorset | Tier 3 | 45 |  |
| Puddletown           | Central Dorset       | Tier 3 | 32 |  |
| Shillingstone        | Northern Dorset      | Tier 3 | 44 |  |
| Upper Marshwood Vale | Western Dorset       | Tier 4 | 9  |  |

4.9 This shows quite clearly the willingness of local communities to tackle housing and employment site allocations locally. Yet Dorset Council have largely disregarded the continuing contributions such plans could bring, and have instead chosen to:

- forego opportunities to actively ask Neighbourhood Plan groups / Parish Councils on the appropriate method for calculating housing targets, and what opportunities they could consider through the future review of their plans
- revert back to previous local plan defined development boundaries in respect of a number of Neighbourhood Plans without any explanation
- hold back the publication of the Neighbourhood Plan background paper (despite it being referenced in the plan)
- ignore locally identified constraints such as the open gap designation with regard to the Pimperne Neighbourhood Plan.

#### Suggested way forward:

ix) Dorset Council should revise its programme for progressing the Local Plan in order to provide a further opportunity for communities to express clearly (1) what level of growth and supporting infrastructure could be beneficial to those communities (2) the extent to which they may wish to take a lead identifying sites to meet any such needs through Neighbourhood Plans.

## 5. CREATING A CLEARER PLAN SUPPORTED BY AN ADEQUATE EVIDENCE BASE

*The draft plan is not easy to understand, and is largely presented as a 'fait accompli'. It, and much of the supporting evidence, is lengthy and poorly summarized.*

5.1 The plan is 582 pages long (671 including the appendices). The sustainability appraisal, which is intended to explain the options and how they were assessed, is another 785 pages (although there is at least a summary version to that document).

5.2 Whilst the Council have made attempts to promote the plan consultation through the use of podcasts and webinars, these are not easy to navigate.

5.3 The consultation posters and strategic diagrams do not really explain the strategy or the options that were considered, and there is no clear explanation as to how issues such as the 'ageing population' are being tackled, with the main driver appearing to be the delivery of homes, wherever land can be found that is not irrefutably constrained.

*Whilst the Council took the decision in June 2019 to commence work on the combined plan, there has been a very patch-work approach to creating a robust and comprehensive evidence base, particularly in terms of how the area and its infrastructure functions. Where evidence has been collated, it is often inadequate in its scope, and there is no clarity about what work is pending and when this may be produced.*

5.4 A key test of soundness of a plan (NPPF para 35) is for it to be **justified** – and this includes the need for it to be based on proportionate evidence. Whilst the Council have indicated that additional reports and evidence are to still to be produced, it is apparent that the strategy that is being consulted on is simply not justified by robust evidence. Our concerns include, but are not limited to:

- The Sustainability Appraisal: the analysis and assessment of options and individual sites is unclear and unsatisfactory and not adequately underpinned by evidence.
- Functional Areas and Settlement Hierarchy studies: fail to consider or explain in any detail how each area / settlement functions, its strengths and its weaknesses, so that any future plans can help address these issues as part of a coherent strategy
- The Green Belt Review: the methodology is flawed and fails to give first consideration to land which has been previously-developed (including brownfield land) and/or is well-served by public transport, as required under NPPF para 138.
- Economic analysis and assumptions, including Town Centre regeneration: are patchwork in their extent and out-dated given the impact of COVID-19 and Brexit. The Government's November 2020 statement and 10 Point Plan for Greener Economic Future provide an idea of future strategic context.
- Infrastructure delivery: the evidence base with regard to the necessary infrastructure and its delivery in terms of medical services, education, drainage, water supply, green spaces, high-speed internet etc, is entirely lacking. In terms of transport, work on the Local Transport Plan review has not even commenced, and transport modelling is incomplete and what is available (such as refresh of

the 2012 South East Dorset Multi Modal Transport Study<sup>12</sup>) has not been addressed in the plan-making process or even shown as part of the evidence base. There is also no evidence on the adequacy of the public transport network of any strategy for its improvement.

- Climate Change and Renewable Energy: the Wardell Armstrong report on Wind Farm sites does not provide a balanced assessment of constraints, particularly in terms of landscape and heritage. There is no evidence looking at the potential for other forms of renewable energy supply.
- Viability: there is no evidence on viability and how this has influenced decision-making. This is particularly important in terms of the major expansions proposed, and the Council were awarded £150,000 capacity funding to undertake a high level Viability Appraisal that was expected to be available to inform rather than corroborate the Local Plan.
- Duty to Co-operate: there is no published information on the information exchanged as part of the Council's Duty to Cooperate

#### Suggested way forward:

- x) The repetition in the plan needs to be reduced and the plan should focus more on explaining its proposals for Dorset. Where policies are simply reiterating national policy, there is little need for lengthy introductions and justification.
- xi) The evidence on which the plan and sustainability appraisals are based should be clearly signposted from within those documents.
- xii) Evidence over 20 sides of A4 should include an executive summary so that it is clear to the reader what the report covers, the basis of the research and the main conclusions reached.
- xiii) Dorset Council should as a matter of expediency publish a comprehensive list of what other work is pending and when this may be produced, and allow further responses to the consultation at that time and prior to publishing the final draft of the plan. Where the Council is intending to rely on developer-produced reports this should be made clear.
- xiv) All documents, including background papers, should be critically reviewed for consistency, clarity and to ensure that they are based on sound and joined-up evidence which is clearly explained and set out within that report. The reports should be dated and the authors (and their qualifications) credited.

Report prepared by Jo Witherden BSc(Hons) DipTP DipUD MRTPI on behalf of Dorset CPRE (Campaign to Protect Rural England).

## DORSET PLANNING CONSULTANT LTD

Director: Jo Witherden BSc(Hons) DipTP DipUD MRTPI  
8 Orchard Rise, Milborne St Andrew, Dorset DT11 0LL  
telephone: 01258 837092 --- mobile: 07983 562036



Registered in England – 10086020

email: [jo@dorsetplanning.co.uk](mailto:jo@dorsetplanning.co.uk) --- website: [www.dorsetplanningconsultant.co.uk](http://www.dorsetplanningconsultant.co.uk)

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<sup>12</sup> <https://www.dorsetlep.co.uk/sedums>