

DORSET LOCAL PLAN CONSULTATION January to March 2021

The West Dorset Campaign to Protect Rural England (CPRE) response

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INTRODUCTION and SUMMARY

Dorset has a very special and rich natural environment which is its greatest asset - including economically. Arguably this is particularly relevant in West Dorset. The environmental value of West Dorset applies to the broad range and variety of interconnected landscapes and habitats – this value cannot be protected by only considering the statutory designations as '**important**'- as the Local Plan does. Failing to address the protection of West **Dorset's** natural and farmed environment as a whole is a lost opportunity. All the people who live in this special place depend on it for their general health and wellbeing. West Dorset is mostly a rural population, largely living in smaller villages and hamlets and, identified by the Local Plan, as suffering from '**social** isolation and **loneliness**'. Yet the Local Plan does not provide for the needs of this population. It is vital that this Local Plan is absolutely right and no mistakes are made - as building is irreversible. The current plan is a very long way from being right.

We feel the plan needs to be reworked and produced as an understandable draft. Housing needs require proper examination and are set too high with a huge target in all of Dorset of 30,481 over 17 years. This seems unrelated to actual need and is very damaging. Dorset Council claim that Green Belt, Areas of Outstanding Natural Beauty and other such designated areas need to be built on to solve **Dorset's** housing needs. Therefore, in that case, certainly Dorset should not be expected to help out neighbouring authorities who have been unable to reach their housing allocation such as has been suggested - a further 9000. Dorset Council should likewise decline to do so, given its environmental and other constraints.

The expression “**wrong** houses in the wrong **places**” seems very pertinent. There are huge sites planned on greenfield land with too few affordable houses, too many second homes etc and far too few for the local population and its needs. The combination of high house prices and low wages has been correctly identified but merely building vast numbers of houses will not solve this. There needs to be much more thought and imagination on targeting the actual needs of local people - affordable housing particularly and at 35% absolute minimum (preferably much more) with public transport and ultrafast broadband connections to isolated villages. Then the creation of well paid jobs.

The draft Local Plan is very long - too long. It is also very similar to previous Local Plans and fails to address key issues and encourages excessive ‘**growth**’. The draft is not easy to understand and appears to be as a finished product already. The consultation as a whole is very rushed and inadequate - especially in the presence of the pandemic.

There is insufficient recognition of Neighbourhood Plans which have been produced with great care and much work by local communities.

More emphasis and solutions to the Climate emergency should be a priority. Building very large housing estates on greenfield land for the convenience of the developer is not acceptable. Properly insulated houses with solar panels on roofs and geothermal heating would be one positive step forward.

WEST DORSET’S KEY ISSUES

West Dorset is particularly beautiful - as is the whole of the county. The countryside is renowned worldwide and is reflected in literature, film and many other forms. Thomas Hardy and William Barnes are but two such internationally celebrated writers from this area and people travel immense distances from all round the world to visit this countryside and see the places where they lived and worked.

Dorset Council state the key issues are:

- 1) The Climate Emergency
- 2) High reliance on car travel
- 3) High house prices, low wages
- 4) Physical, mental health and social isolation
- 5) Fragile natural environment

All of these issues we agree are very important. But the new draft plan does not address them adequately.

HOUSING NUMBERS

This proposed plan is encouraging excessive growth and, as is usual in this situation, the environment suffers.

A target of 30,481 dwellings is proposed over 17 years for all of Dorset as well as another possible 9000. How this figure is arrived at in terms of *local need* is not explained. There

is no plan to protect the beautiful countryside of Dorset - rather the opposite. Dorset CPRE commissioned an independent report by Opinion Research Services - "**Dorset Housing Needs Evidence 2020**". This covered all of Dorset including West Dorset and found the projected numbers by the government to be too high.

Dorset house prices have remained stable compared to the national trends showing increases suggesting that the houses built here have met the need. The government stated in a 16th December 2020 statement that the numbers from the standard methodology are not a target but a starting point to determine need, and local constraints, such the need to use Green Belt, AONB, special historic sites (like Dorchester) may prevent development which must be sustainable (NPPF para 35). 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.

Planting about 3,500 houses north of Dorchester (DOR 13) on a greenfield space may well be very attractive to a developer making his task much easier. In addition there are approximately 300 more at Charminster and more at Poundbury. This does not show much imagination in respect of planning. There is a case for drastically reducing this number and adding small settlements to Dorset villages. This would help support local businesses - shops, pubs and very importantly schools. In addition there would be support for essential public transport to these villages - sadly lacking now. In this respect more emphasis in the Local Plan should be made 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.

Large developments such as north of Dorchester, Vearse Farm and Littlemoor will necessarily put greater strain on infrastructure, cause greater environmental impacts, sustain high housing land values and do little to address rural Dorset's actual needs. Specific infrastructure has not been adequately planned. For example the required significant increase in doctors and medical services has not been addressed. We were informed that local doctors were asked by Dorset Council whether they would prefer new surgeries to be built, and that they replied by saying they would rather work longer hours. As a very surprised doctor myself, I then asked several current local General Practitioners if they agreed. They replied unanimously, and very firmly, that they did not - with some embellishment!

DORSET'S ENVIRONMENT

It must be emphasised and repeated that **Dorset's** environment is its greatest economic asset by far. It is essential for the mental and general health of all those living here - and for visitors. It is vital that this precious environment is not concreted over and destroyed for all concerned - living here and visiting. This should be the first priority of the Local Plan. It clearly is not. It is important that National Park status has been applied for. Dorset has (at the moment) great natural beauty, a huge cultural heritage, wildlife, recreational opportunities and very significant archaeology. There is the Heritage Coast and the Jurassic Coast, two Areas of Outstanding Natural Beauty and there are Sites of Special Scientific Interest and other areas of conservation. There are also areas of Ancient Woodland. In addition to important archaeological sites (some very vulnerable to the proposed development at Dorchester) there are iron age forts and other monuments.

It appears that even the Green Belt and AONBs are not given the respect they deserve, not to mention all the others. In the December Government statement mentioned earlier it states “**More** broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.’

Although it is important to protect the **County’s** designated environmental sites (AONB, Jurassic Coast, Nature Reserves, SSSIs etc) these are the **Council’s** statutory obligations. The non-designated landscapes, ecological sites, hedgerows, tree cover etc are neglected and undervalued by the Local Plan, yet all together create the valued countryside of West Dorset. Their connectivity is also critical for the green infrastructure that we need to counter the Climate Change Emergency. There is no attempt in the Local Plan to make protection of the ‘**natural capital**’ of West Dorset a priority in the face of pressures for development. This is both very disappointing and worrying.

The site north of Dorchester, as well as Vearse Farm, Littlemoor (both the latter two in the Dorset AONB) and other developments, will cause a great increase in road traffic. All of this reinforces the point that the Local Plan gives insufficient recognition of, or respect for, Dorset’s exceptional landscapes, its wildlife and its heritage.

Another exceptionally important issue is the Climate Emergency. Carbon emissions and importantly carbon consumption needs to be reduced drastically. The Local Plan needs to specify that new houses, where built, should be constructed to the highest environmental standards, with adequate insulation, fitted with solar panels on roofs where possible and other renewable energy features such as geothermal heating. When it comes to design, developments should clearly take account of local vernacular and heritage, architecture and materials.

Public transport needs to be greatly improved (or even put in place at all) especially to remote villages and fully financed. The increase in cars and the paucity of public transport makes a mockery of the governments green strategy.

With regard to suitable sites for the deployment of large scale onshore wind turbines, the National Planning Policy Framework, draft text for consultation, Planning for climate change, Section 14, para. 157(b), footnote 53, p.46, Ministry of Housing, Communities; Local Government, 30 January 2021 states ‘**Except** for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their **backing.**’

I think it is important to add that preserving farmland is also of extreme importance with increasing population, immigration and so on - coupled with coincidental destruction of green spaces as discussed. We have to be able to feed ourselves. Farmland is also a key component of the ‘**green infrastructure**’ that helps counter climate change, and a significant source of valuable wildlife habitat as well as being the fabric of West **Dorset’s** landscape. The Local Plan does not acknowledge the value and contribution of farmland or farming in its policies, despite the fact that farmland is generally the source of land for proposed development.

INVOLVING LOCAL COMMUNITIES

There has been little or no consultation with local communities about the key issues affecting them. There are restricted opportunities for local people to become involved with the consultation due to the COVID pandemic: no public meetings, no libraries open, few paper copies of the Plan and, for many, limited online facilities. This consultation has been very rushed and gives the impression that Dorset Council has little intention of making any changes. Few options or choices are included.

It has also been frequently pointed out that there is insufficient recognition or respect for Neighbourhood Plans into which communities have invested much time and effort - some have taken years. Most Neighbourhood Plans have now been completed - 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. One might ask - whatever happened to Localism? There is very little here.

EVIDENCE BASE AND A CLEARER PLAN

This draft local plan is extremely long - over 2000 pages. The main purpose seems to be the building of more houses and very little on the many other issues - including the ageing population, incoming retirees and others mentioned above. The plan appears to be a collection of 'cut and paste' from previous drafts with generally inadequate evidence. The repetition in the plan needs rectifying and it needs to be much more concise and to the point.

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.

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.

The response (prepared by Jo Witherden, Dorset Planning Consultant) and a separate report on Renewable Energy issues submitted by The Dorset Branch of CPRE is fully supported and commended by the West Dorset CPRE Group. 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 **community's** interests and environment at its heart.