



Date: March 2024

To: Councillor Spencer Flower, Leader of Dorset Council

CC All Dorset Councillors

CC Steven Ford, Matthew Piles

CC Dorset's MPs

Re: Dorset Council Local Plan

Dear Councillor Flower

It is over 3 years since Dorset Council consulted on its draft Local Plan. The consultation did not offer the public a series of options and issues to consider as might have been expected. Instead, it presented a pre-decided housing plan based on excessive commercial housing targets mostly on greenfield sites. Our initial reaction (and that of the public at large) was one of great disappointment:

- There was little to address the needs of local people for social housing.
- With a high concentration of proposed developments located on greenfield and greenbelt land it had a disproportionately damaging effect on the countryside.
- It was disconnected from the Council's own Climate and Ecological Emergency Strategy. The consultation showed that the draft Local Plan was deeply unpopular with the public. The majority of them rejected the housing strategy at the heart of the plan (DEV1).

Following extensive campaigning by Dorset CPRE and Dorset Deserves Better, and an open letter sent to you on 11th January 2022, we were encouraged by the comments you made on 26th January 2022¹: "As a result of the unprecedented 9,000 responses our public consultation received, many residents share my view that the draft Local Plan chases housing numbers rather than prioritises local needs."

This position was strengthened further by Councillor David Walsh, Portfolio Holder for Planning, who stated in Cabinet on Tuesday, 26th July 2022² that:

 $[\]frac{1}{\text{https://news.dorsetcouncil.gov.uk/2022/01/26/a-local-plan-that-is-right-for-dorset-cllr-spencer-flower-leader-of-dorset-council/}$

² https://news.dorsetcouncil.gov.uk/2022/07/26/dorset-council-local-plan-cabinet-update/

"In summary, respondents told us we should:

- Challenge the housing numbers they should reflect the needs of Dorset, not blindly follow a government calculation and not include housing for BCP Council
- Support building more affordable housing across the area, helping working families and young people to live in Dorset
- Protect Dorset's unique natural environment
- Tackle climate change as our leading priority, ensuring the Dorset Council Local Plan and our Climate and Ecological Emergency Strategy and action plan are fully aligned
- Consider the infrastructure requirements of new development: public transport, roads, health and education services, utilities to ensure the needs of residents are met."

Following this, the Council made the decision to delay the Local Plan by 2 years to address these issues and to respond to the changing government directives including those in the revised National Planning and Policy Framework (NPPF) and the Levelling up and Regeneration Act (LURA). However, during this period, the original draft Local Plan has not been withdrawn and continues to influence developers and planning decisions.

Over the last year, there here have been some positive initiatives by Dorset Council, including a stronger link between planning and the Natural Environment, Climate and Ecology Strategy (NECES) and the "Planning for Climate Change" initiative which introduced the Climate Checklist. We also welcomed the decision by the UK government to drop the "duty to cooperate" – removing the requirement for Dorset Council to meet any unmet housing need in BCP.

On the other hand, Dorset's new Housing Strategy, published in August 2023, was disappointing. It was purely a visioning document with no proposed targets and the accompanying "Fact Sheet" included exaggerated population growth estimates compared with the Government's published ONS figures. Furthermore, in a presentation to town and parish councillors in 3Q 2023, the projected "housing need" numbers for Dorset were quoted as 1900pa – an unwarranted increase on the 1797pa in the draft Local Plan.

Changes to the NPPF mean that the "standard" approach to calculating housing need (which includes the discredited "affordability uplift" of 38%) is no longer mandatory. Dorset's exceptional environmental sensitivity and exceptionally age-heavy population require a different approach. There is a great opportunity now for Dorset to set a sustainable housing programme which truly reflects Dorset's housing needs.

The lack of public information about the revised Local Plan has also been a significant concern. The timetable published in 2022, indicating publication of a revised plan in 4Q 2024, allowed insufficient time for meaningful consultation or amendment before submission to the Secretary of State in 2Q 2025. We have now seen the revised schedule for the new Local Plan in papers for the March Cabinet. The scope of the planned work, consistent with the new NPPF, enables a fresh start on the Local Plan. Communities will want to be reassured by Dorset Council that there will be genuine consultation on issues and options - including housing numbers and types, and environmental, infrastructure and social considerations and constraints - and that Dorset Council will then develop a draft Local Plan which reflects communities' views.

We would welcome an early meeting with Dorset Council to discuss the implications of the delayed timetable for a new Local Plan, and how they intend to deal with urgent priority concerns, such as the need for truly affordable homes, and other issues which could result from further delay.

Our Request to you

We all want Dorset to be a thriving community, to have a vibrant and sustainable economy, to have a low or zero carbon footprint, to have high biodiversity and to remain one of the most beautiful and enchanting areas of the country to live in. The Local Plan is the Council's most influential document when it comes to defining the shape of our future and it is too important to be put together behind closed doors with little or no consultation on its new content.

We reiterate our support for Dorset Council in drawing up a revised Local Plan but call for more transparency and involvement of local people, local organisations and our representatives in local town and parish councils.

We remind you of the results of the 2021 consultation and the five key points (summarised above) made by Cllr Walsh in his message to cabinet on 26th July 2022; and we ask you to issue a public statement about your progress towards addressing these five points.

Finally, we reiterate that Dorset CPRE and Dorset Deserves Better will be campaigning for the following ten points which we believe are central to the prosperity of Dorset residents and the preservation of our unique countryside and environment:

We believe the next Dorset Local Plan must:

- 1. Protect Dorset's outstanding environment, biodiversity and heritage from excessive and inappropriate development which Dorset lacks the capacity to accommodate sustainably.
- 2. Place greater emphasis on building social housing, affordable housing, cooperative and communal living spaces, and low-cost rental accommodation to meet very clear local needs.
- 3. Enforce the affordable housing commitments placed on developers who often slide out of their obligations using recalculated "viability" as an excuse.
- 4. Build commercial housing in quantities that reflect the particular needs of Dorset taking account of the ageing population statistics and not blindly follow a figure produced by a widely criticised government algorithm.
- 5. Concentrate new housing on brownfield not greenfield sites with appropriate infrastructure to ensure sustainable transport.
- 6. Balance the demand for second homes and short-term rentals against the need for long-term rented housing. This should include the use of a Principal Residence Policy where appropriate.
- 7. Drive towards a thriving Net Zero economy based around 100% renewable energy, better insulated housing, the circular economy and net zero emissions.
- 8. Ensure that all new homes are zero carbon by 2030 and support Option 1 in the government's Future Building Standards consultation.
- 9. Deliver nature recovery throughout Dorset's countryside, including a transition to regenerative farming and meeting the government's 30x30 commitment to protect 30% of land and sea by 2030.
- 10. Inform and consult with local people, community representatives and interested groups about progress on the new Local Plan including the development of new draft policies.

We look forward to your earliest response to this letter.

Yours sincerely

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Dorset CPRE

Dorset CPRE, the countryside charity, is the local branch of the CPRE – Campaign to Protect Rural England. CPRE has campaigned for almost a century to promote, enhance and protect the countryside for everyone's benefit, wherever they live. We work with communities, businesses and government to find positive and lasting ways to help the countryside thrive - today and for generations to come. The CPRE, both nationally and locally, contribute to major consultations including strategy, housing, planning and the environment.

Dorset Deserves Better

Dorset Deserves Better (DDB) is an alliance of local organisations campaigning to persuade Dorset Council to rethink the Local Plan in a way that supports local needs and environmental concerns. DDB has the support of 66 organisations across Dorset including 25 Town and Parish councils representing over 30% of residents in Dorset. DDB was set up by the Advocacy Group of Dorset Climate Action Network (DCAN).