



The countryside charity
Dorset

Dorset CPRE

Open Consultation-Proposed reforms to the NPPF and other changes to the planning system.

Date submitted: 24th September 2024

Introduction and General Comments

This response is prepared by the Dorset Branch of the Campaign to Protect Rural England (CPRE). Much of our work involves interacting with the local planning system, we actively engage with both Dorset Council and BCP Council.

We wish to see planning and development which deliver the right houses in the right places, through Local Plans which are appropriate to their areas and communities. Local Planning Authorities (LPAs) know their local areas and communities, and the value and significance of their local environment and heritage. LPAs are best placed, in consultation with local people, to devise plans which: support sustainable communities and meet housing needs including for genuinely affordable homes, promote the local economy, address the climate and nature emergencies, and protect and enhance the environment and heritage.

The Government's stated goal of adopting a brownfield first approach to development is much welcomed, but in our opinion, it needs to be strengthened to ensure that previously developed land is not passed over in favour of more easily developed greenfield sites. The Port of Poole has a significant number of previously developed sites including the former Poole Power Station which has been undeveloped for over 30 years. This brownfield site, allocated in the Local Plan to provide housing and employment land, and subject to numerous planning applications for re-development, still sits vacant whilst precious land in the Green Belt has been released for development instead to meet Poole's housing need.

It is essential that Green Belt protections are maintained and that our landscapes are protected as we transition to use of renewable sources of energy. Currently one in six species of animals, plants and fungi in the UK are at risk of extinction (State of Nature Report, 2023), it is essential that planning policies support nature restoration at every opportunity and that productive agricultural land is protected from development.

These comments have been organised with reference to the relevant consultation questions, using the same numbering as in the consultation document.

Chapter 3 - Planning for the homes we need

Advisory starting point and alternative approaches

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No. The changes to the old para 61 should only be reversed if the proposed new Standard Method is fit for purpose. We don't believe it is. Local planning will continue to stall for that reason.

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No. Local Authorities are best placed to assess the amount and type of housing that will meet the needs of their communities and that can be feasibly delivered taking into consideration their individual circumstances/constraints and should have the option of claiming that exceptional circumstances justify the use of an alternative method of determining housing need.

BCP Council, has recently submitted its draft local plan for examination. This predominantly urban local authority is severely constrained in form of being bounded by Coast to the South, Greenbelt to the North, having areas at risk of flooding, and internationally significant Heathlands. Over the last 15 years housing delivery rates have averaged 1,117 homes per annum, significantly less than the 2962 homes per annum that the new Standard Method states as being required. Realistically BCP are aiming to deliver 1600 per annum in the draft local plan submitted for examination which given the local authority's population dynamics will adequately meet its needs.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Yes.

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Yes, the old para 130 appears to serve little purpose.

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Broadly agree, but we question the phrase "in particular" and would replace it with "including"; the former may weaken other policies in favour of those cited, the latter doesn't.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No. Requiring local authorities to maintain a five year housing land supply has many disadvantages. A local authority's housing land supply is often disputed by developers in appeal cases, often leading to un-sustainable sites being granted planning consent on the basis that the tilted balance in favour of development applies as the local authority does not have 5 years of deliverable sites.

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No. Given the enormous buffer built into the proposed new Standard Method ($370,000/300,000 = 1.23$, therefore a 23% buffer is built in already), extra buffers in both the 5 Year Housing Land Supply and Housing Delivery Test serve no purpose and look onerous.

A target of 1.5 million homes over 5 years is less than 370,000 per annum. Dorset CPRE suggests that plans and 5 Year Housing Land Supply should be on a buffered housing need figure, whereas the Housing Delivery Test should be measured against an unbuffered housing need (new Standard

Method x 30/37 for instance). If land is being allocated and permissioned at the buffered rate, there is little more a Local Planning Authority can do, so further buffers are unnecessarily complicated.

Question 11: Do you agree with the removal of policy on Annual Position Statements?

No. In the circumstances where there is a requirement for local authorities to demonstrate a specific housing land supply (currently 4/5 years) Local Authorities should be able to produce an annual position statement. This is a useful tool, and provides a degree of certainty in the decision making process.

Dorset Council does not have an up to date local plan. We have seen several planning applications for large developments, originally refused by Dorset Council being granted consent on appeal as developers successfully disputed the Council's stated 5 year housing land supply. Dorset Council in July submitted a draft Annual Position Statement to PINs showing a 5 year housing land supply. Should this be approved developers will not be able to dispute the Council's Housing Land Supply status which will save time, money and provide greater certainty for decision making.

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Agree in principle, but pending subject to the details proposed.

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Dorset CPRE has strong reservations about 15 year plans and strategic plans that are based upon poorly-justified national targets that are distributed with no genuine evidence of appropriate localisation. Such plans cannot be known to be in the public interest.

Chapter 4 - A new Standard Method for assessing housing needs

Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No. Housing stock and the baseline for household projections are broadly similar – stock and households differ only because some stock is empty or not occupied permanently. In planning housing for households, household projections are the best starting point.

Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

No. The goal of reform is to assist those who struggle to afford good secure housing. A better measure of their difficulty would be the **lower quartile** workplace house price to earnings ratio.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No. For Dorset Council, the new formula breaks down as:

Housing need per annum = **0.8% stock + 0.9% stock due to affordability ratio above 4**
= **1,497 baseline + 1733 due to affordability** = 3,230 total

This compares with recent net additions of **1,646** homes pa.

While understanding the mission to reduce prices, Dorset CPRE has no confidence in the mechanism of allocating so much more land to achieve this. Dorset Council can demonstrate a 5 Year Housing

Land Supply already, so the demand for doubling sales of new homes is not evident. In practice, for lack of increased sales, most of the expected homes would not be built.

Therefore, we contend that the affordability adjustment is far too high. We would use a baseline constructed by combining projected growth and recent sales, and add a proportional affordability adjustment intended to represent additional social rent homes. By this means, affordability would be affected directly by providing homes that are affordable, rather than speculating that long-term hyper-growth might lead to marginal price decreases overall. The paper by Prof Bramley referenced in the Consultation itself (as Ref 5) points out the futility of the proposed approach (page 15):

“The finding that even quite large increases in housing supply do not have large impacts on affordability and tenure in the medium term is one which has been argued previously, for example by Meen (2011), and some of my own work. It may be ... a caution to politicians not to promise what is not deliverable.”

Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Yes. We suggest that the 30th percentile rent data used for setting LHA could be used? For instance the current LHA for 2 bedrooms is correlated to AR but not so highly that LHAs of about £220 are associated with Affordability Ratios from 8.3 to 13.7; so extra information could be obtained using LHAs to construct a more accurate formula for housing need?

Question 19: Do you have any additional comments on the proposed method for assessing housing needs?

The Consultation defends the new formula saying (19b) that a house price to earnings ratio of more than 4 puts a mortgage out of reach for the average earner. This is not true. The average earner without equity doesn't have to pay an average house price as a First Time Buyer, they can buy lower in the market. Also, Nationwide (says Which) offer mortgages up to 5.5 times earnings for single buyers earning £37,000, and 4 to 4.5 times is common. For first time buyers in the UK in 2023 the average FTB mortgage was 3.4 times income, the same as 2004 (ONS Table 30). The Consultation exaggerates the overall position. Those who really have a hard time are low-earners, not average, who need social rent homes. Dorset CPRE believes they should be the focus of change.

This new formula would require output of new homes in Dorset Local Authority area to rise from 1310 in 2023-4 to 3230

pa. Given that Dorset Council can demonstrate a 5 Year Housing Land Supply based on 1,793 new homes pa, it is not clear

that these changes in the NPPF would, on their own, increase sales to meet the new target within the foreseeable future.

Local plans based on the new targets would require about 60,000 new homes to be planned in Dorset Local Authority Area over the next 15 years (including an overspill from BCP). It is ridiculous to expect Dorset's infrastructure to cope with the impact of the corresponding 130,000 net population growth on roads, NHS, social care, water/sewage and carbon targets?

Chapter 5 - Brownfield, grey belt and the Green Belt

Whilst we whole heartedly agree with the Government's intention to adopt a brownfield first approach for development, we are greatly concerned about the impact that the proposed introduction of Grey belt will have on the integrity of Green Belts particularly, smaller Green Belts such as the South East Dorset Green Belt that surrounds Bournemouth Christchurch and Poole.

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

We welcome the government's intention that Brownfield land must be the first port of call for development and agree that paragraph 124 c (new numbers 122) should be amended as suggested. However, it is essential that in assessing the suitability of Brownfield Sites for Development heritage, ecological and biodiversity constraints are considered in addition to impact on highways, flood risk etc.

Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

No, we do not agree with the proposed changes to 154g. One of the characteristics of Green Belt that contributes to its value to urban and rural communities is its open nature. Should previously developed land be released from the Green Belt for development it should be in order to provide truly affordable homes for local people where there is a demonstrable need. Therefore, 154g should not be amended.

Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Redundant glasshouses on hard standing could be used for alternative development given that it can be demonstrated that there is no demand for alternative horticultural uses, where the holding has involved crops growing in the soil (or having the potential to do so), such as on holdings where poly-tunnels were erected, these should be excluded from the definition of PDL.

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No, we do not agree with the current definition of grey belt land, which is too vague and could include land which, while for planning purposes is considered to be developed is 'green' for example golf courses and racecourses, provide important wildlife oasis, public recreational benefits and maintain the much valued 'open' nature of the Greenbelt.

With regards to the proposed NPPF glossary providing guidance on Land which makes a limited contribution to Green Belt purposes, we would like to see item b)i, "*Land containing substantial built development or which is fully enclosed by built form*", removed. Pockets of land meeting this description should remain designated as Green Belt as they provide invaluable wildlife oasis, and form part of a wildlife corridor, essential in our nature depleted country. These spaces are also highly valued by neighbouring communities.

We agree that land of environmental value should be excluded from the definition of grey belt, as set out in footnote 7 of the NPPF.

Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes, to ensure that high performing Green Belt land is not degraded to meet grey belt criteria, we would like to see the removal of permitted development rights that apply to agricultural holdings within the greenbelt. Any high level green belt sites that are to be considered for release should be required to demonstrate that their current use is no longer viable.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes, additional guidance should be provided, with such land having to meet strict criteria

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

It is important that Local Nature Recovery Strategies (LNRS) encompass the Green Belt within their areas and examine their potential for enhancement. Such enhancement of Green Belt areas can offer measurable benefits for both nature and people, enriching biodiversity and giving a lifeline to wildlife, while also enhancing the physical and mental health and wellbeing of local communities through inclusive access to green space for people of all ages.

We suggest that Local Authorities which are responsible for LNRS be asked specifically to examine the potential for Green Belt enhancement, and to comment on such potential and actions undertaken to achieve this when reporting to DEFRA, Natural England, local communities and other stakeholders including Wildlife Trusts and CPRE.

When any planning application relates to a Green Belt area, the LNRS and its observations on the value and potential of the Green Belt for nature and for people, should be referenced and taken into account in considering the application.

Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes, but it's hard to see how effective such a vague 'catch-all' formula is likely to be in practice.

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No - Absolutely Not!!! Previously Developed Land in the Green Belt should not be released for re-development outside of the plan-making system in circumstances where local authorities are unable to demonstrate a 5-year housing land supply. This will result in sites of dubious suitability for development being granted planning consent and erosion of the Green Belt.

A recent survey carried out by property software company APRAO quoted, in the Building Design and Construction Magazine, April 24 reported that the seven major property developers (Bellway, Vistry Group, Taylor Wimpey, Redrow, Persimmon Group, Berkeley Group and Barratt Developments) currently have 501,691 plots land banked. Should these plots be built and brought to market they would make a significant contribution towards meeting the Government's housing targets. Mechanisms to ensure that developers build the homes that already have consent for should be investigated prior to any further land being released from the Green Belt.

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

We do not support the release of grey belt land to meet commercial or other development needs. Any circumstances that would trigger the release of grey belt, which is currently poorly defined, for commercial development would create potential development loop holes.

Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The 50% target should apply to all Green Belt areas.

Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

No. It would be quite impractical for the Government to set benchmark land values (BLV) for Grey Belt which covers a potentially very wide spectrum of uses from "non-performing agricultural land" to "previously developed land". We believe that BLV for Grey Belt and Green Belt should be based on the RICS definition of EUV without any vendor value plus of 10%/20% incentive addition for disposal which has become in our view a completely arbitrary addition. This approach to BLV should apply to all Viability Assessment across the board and be stated clearly in the NPPF definitions section. We also believe that all residual valuation components of Viability Assessment (VA) should be open book from the date of application in order to grant the opportunity for clear public scrutiny as has been adopted in Rotherham and will have the direct societal impact of reducing "Development Value". We also recommend that a new code of practice is produced for VA by the Valuation Office Agency and that this is referenced in the NPPF guidance notes. The District Valuer as an independent statutory officer should be appointed in the NPPF as the "valuation arbiter" for all VAs where they are required by applicants who are unwilling to agree to development obligations.

Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

The 50% affordable housing requirement should be made mandatory and non-negotiable. Within the 50% requirement Local Plans must be able to set specific targets for social rented homes in line with genuinely assessed need.

Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Any land released from the Green Belt or on 'Grey Belt' must be subject to the Golden Rules. Local Authorities should have the power to seek further contributions to affordable housing to meet local need if required.

Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Yes. Late-stage assessments should be applicable, but independent assessments of viability should be ascertained and not those commissioned by the developer.

Chapter 6 - Delivering affordable, well-designed homes and places

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes. Dorset CPRE agrees that local needs should be set out in a comprehensive housing needs assessment, particularly Social Rent as part of broader affordable housing policies. The need for new social rented housing is particularly urgent in rural areas. In 2023 CPRE research found that it will take 89 years to clear the rural social backlog of 306,700 people on the waiting list. From 2000 to 2022 waiting lists for rural social housing increased by 10.8%.

Therefore, reform of the NPPF will need to ensure some levers to ensure developers do implement them, as the current viability focus allows developers to easily renege on agreed contributions. This is the real cause of housing market dysfunction, as developers do as they please. In future housing developers need to be held to account.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes but it should be replaced with a requirement to have a mandatory 35% allocation of genuine affordable housing of which 50% should be social rent housing on sites in excess of one hectare or 30 units. Currently the majority of Local Plans including London, Birmingham and Manchester have an average affordable housing allocation of 35% and this should be maintained and reinforced by the new NPPF. Government policy is to support a large expansion of social rent homes which is regarded as the biggest housing need that we are currently facing. This requirement can be adjusted by "open book" viability assessment where all viability assessment calculations are shown on the planning register as part of the planning application including for example site specific adverse ground conditions. This will stop any possible confusion faced by developers who may inadvertently have presented different viability assessment submissions to their funders. Affordable home ownership is a term that is currently open to wide misrepresentation since homes that are offered as "shared freehold ownership" are no such thing since the applicant finds that all they are offered is a long leasehold with the obligation of a difficult to control high service charge and the mere "opportunity" of an option within the lease to acquire a share of the freehold the price of which is escalated from the time of the grant of the tenancy.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Yes

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes, this policy should require a mandatory 35% allocation of genuine affordable housing of which 50% should be social rent housing on sites in excess of one hectare or 30 units. Currently the majority of Local Plans including London, Birmingham and Manchester have an average affordable housing allocation of 35% and this should be maintained and reinforced by the new NPPF. Government policy is to support a large expansion of social rent homes which is regarded as the biggest housing need that we are currently facing. This requirement can be adjusted by "open book" viability assessment where all viability assessment calculations are shown on the planning register as part of the planning application including for example site specific adverse ground conditions. This will stop any possible confusion faced by developers who may inadvertently have presented different viability assessment submissions to their funders. Affordable home ownership is a term that is currently open to wide misrepresentation since homes that are offered as "shared freehold ownership" are no such thing since the applicant finds that all they are offered is a long leasehold with the obligation of a difficult to control high service charge and the mere "opportunity" of an option within the lease to acquire a share of the freehold the price of which is escalated from the time of the grant of the tenancy.

Question 54: What measures should we consider to better support and increase rural affordable housing?

We believe that the following measures would support and increase rural affordable housing:-

1. The NPPF should state that land for community development, such as that by a CLT, should be allocated as such within the Local Plan. Currently it is likely to fall within the windfall site policy. Meaning that a clear % of the affordable housing being proposed is allocated to a CLT (if one exists) in that area.
2. If the above doesn't occur, then rural exception sites planning applications put forward by CLTs should be clearly seen as sustainable development.

3. Current policy of allowing CLTs to retain freehold rights and exclusion from right to buy must remain if leasehold and right to buy policy is changed
4. Although probably not a factor in the NPPF any funding relating to development of brownfield sites should be extended to include community organisations such as CLTs.
5. Incentives should be put in place to encourage landowners to release plots within/ adjacent to rural communities for development to provide affordable housing for local people where there is a demonstrable need evidenced in a Neighbourhood Plan.

Question 57: Do you have views on whether the definition of ‘affordable housing for rent’ in the Framework glossary should be amended? If so, what changes would you recommend?

Yes. Affordable housing should be redefined as Affordable housing for rent at less than 60% of market rent and this definition could conveniently replace the term "social rent" and Affordable housing for sale at less than 75% of market value but service charges on leasehold offerings need much tighter regulation.

Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?

No, references to 'beauty' and 'beautiful' should remain. In losing the word beauty we will have lost something special from our ability to shape our future. Large scale developments should be subject to local community based design competitions. Local Plans should have design codes that include an aspiration of beauty. Beauty is a central architectural aspiration that should be enshrined in planning guidance. "Good design" is a very poor developer-led alternative! "We all want beauty for the refreshment of our souls" (Octavia Hill 1883).

Chapter 7 - Building infrastructure to grow the economy

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

It is essential that in identifying and setting criteria for Development schemes such as Distribution Warehouses, Gigafactories, Data Centres etc that careful consideration is given to their impact on the environment and schemes should not be considered either in, or, adjacent to Designated landscapes or areas of ecological importance. Priority should be given to siting such schemes on Brownfield sites.

Chapter 8 - Delivering community needs

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes, Dorset CPRE supports the provision of public service infrastructure and supports the changes.

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes, Dorset CPRE agrees with the proposed changes to paragraph 99.

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Planning of new housing developments inevitably places new demands on the transport infrastructure both in the immediate area and the wider hinterland. The capacity of that infrastructure must therefore be a control on the scale of any new development. A ‘transport vision’ must be built on a need to protect the environment. It should prioritise opportunities to reduce car

traffic particularly by solo drivers. Shared car schemes, taxis, public transport (bus and rail), cycling and foot should all be promoted. The need to subsidise public and community transport in rural areas must be recognised if these are to provide a real alternative to car journeys.”

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

There is mounting evidence of the vital contribution of access to nature and greenspace to physical and mental health and wellbeing. This has great economic as well as social and personal value, for the country nationally and for communities. The countryside has great value and potential to benefit people, nature, the economy and climate. With appropriate planning and management, in consultation and partnership with communities, the countryside can provide wide-ranging economic and public benefits: good quality food and food products; health and wellbeing for local communities and visitors; biodiversity and nature recovery; improved water management and reduced pollution; carbon capture and renewable energy; jobs, skills and sustainable growth. The countryside can play a key role in a sustainable, low carbon economy, helping both rural and urban communities to thrive

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

Access to secure, affordable homes of appropriate tenure, size and quality, is also a key factor in family and community health and wellbeing. The government should redefine Affordable Housing, or the true need [in particular for homes for social rent] will not be accurately identified or effectively met. There is clear evidence that public investment in truly affordable, social housing would yield positive returns for the economy, public finances and society through multiple benefits, including: health, wellbeing and NHS budgets, improved employment prospects and productivity, higher educational attainment and skills.

Chapter 9 - Supporting green energy and the environment

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

We believe that the climate emergency is the greatest threat facing the countryside and we support greater renewable energy deployment alongside energy efficiency measures to achieve the UK’s net zero target. We have major concerns however about proposals to reintegrate onshore wind farms within the nationally significant infrastructure project (NSIP) process. Thus we would only agree reintegration on the basis that thresholds for onshore wind should rise to 100MW so that in Dorset all onshore proposals are likely to fall outside the NSIP process, and are fully scrutinised and decided locally.

In July 2024 CPRE published a joint report with the Aldersgate Group and the industry body Renewable UK. The research highlighted wider problems with a lack of strategic planning for energy infrastructure, a need for joined-up policy, and improved public engagement. These challenges are compounded by a lack of resources across the system and difficulties around access to data. We do not agree with speeding up the system for individual projects until it has been clearly discussed and agreed as to what wider plan or programme they are contributing towards. Large wind turbines can have major impacts on landscape quality and tranquillity and strategic planning is essential so that such impacts can preferably be avoided as far as possible.

We also believe there should be active encouragement of small community-led solar greenfield projects, which have support from their local communities

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

We agree that support should be given to renewable energy generation schemes, however, other methods for reducing energy consumption/demand should also be considered and provide-weight in planning policy e.g. energy efficient construction, locating development close to public transport and promoting car-free development etc.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Habitats containing peat soils not only are globally important for the role that they play in carbon sequestration and water retention, but are also important wildlife habitats, home to many unique flora and fauna. These habitats should be afforded additional protections and policies put in place to support their repair where they have been damaged.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

We agree that the threshold at which onshore wind projects are deemed to be Nationally Significant should rise from 50MW to 100 MW.

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

We prefer that the threshold at which solar projects are deemed to be Nationally Significant should rise from 50MW to 150MW, but only to 100MW in line with wind, in order to achieve consistency.

Tackling climate change

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

A common threshold for all technologies of more than 100 MW would reduce potential confusion.

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

We would like to see the following policy changes for managing flood risk adopted in the NPPF:-

Policy – provide adequate funding to enable those responsible for managing flood risk to achieve their aims.

According to the report on “The floods investment programme”, published on the 25th March 2024 by the previous government, “The government is investing a record £5.2 billion between 2021 and 2027 in flood and coastal erosion projects, to better protect communities across England”. There are concerns that funding for future flood resilience programmes will be insufficient to meet the needs of a number of the twelve Regional Flood and Coastal Committees. As yet we are unaware that the current government has announced how much it plans to allocate to these projects, but policy should dictate that adequate funds are made available to those responsible for managing flood risk.

Policy – prevent permission being given to allow development on flood zones 2 & 3.

Instruct Local Authorities to refuse planning permission for developments on flood plains (flood zones 2 & 3) without there being any recourse to giving approval on the basis of exceptional circumstances.

Local Authorities will be under even greater pressure to provide even more dwellings. Flood mapping needs to be up-to-date and combined with local knowledge. It can be difficult when flood maps indicate that a zone is safe to build on, but where it is known that the area is subject to flooding. The EA's national flood risk assessment (NaFRA) is being updated (**NaFRA2**) and is due to be published later this year. This national assessment of flood risk will help Local Authorities improve decision making when assessing planning applications that involve flood risk areas.

Policy – work towards implementing recommendations given in reports that specifically address issues in need of resolution for the water industry, including flood risk.

A number of reports have been issued to provide advice on how the situation regarding managing flood risk and the water industry overall have been published in recent months. These include SSWAN (Sustainable Solutions for Water and Nature) and Resilience to flooding which is a House of Commons Committee report.

Policy – promote schemes to enable local authorities to work together on flood risk management projects.

This is based on a very successful approach taken by councils in the East Solent Area to deal with flood and coastal erosion called 'Coastal.Partners.org' where they help to protect thousands of homes, businesses, wildlife and infrastructure. Together, they manage flood and erosion risk, planning and designing new coastal defence schemes.

Policy – enact Schedule 3 to the Flood and Water Management Act 2010

The government commenced a review of the case for implementing Schedule 3 to the Flood and Water Management Act 2010 concerning Sustainable Drainage Systems (SuDS). The review was to ensure that the commencement of Schedule 3 in England would support the objectives of alleviating pressures on the sewer network and reducing flood risk, as well as improving water quality, amenity, biodiversity, and rainwater harvesting. If implemented, this Schedule would introduce standards for new sustainable drainage systems as well as making connection to public sewers conditional of approval that the drainage system meets the national standards. All SuDS will be adopted by Local Authorities for developments greater than one dwelling. This will require additional resources to enable Local Authorities to comply with Schedule 3.

Availability of agricultural land for food production

Question 82: Do you agree with removal of this text from the footnote?

No, we would like to see the text in footnote 63 pg 55 of the NPPF retained.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes, all land in the higher agricultural land classification grades (**1,2 and 3a**) should be exempt from being considered for development. Productive agricultural land situated close to housing developments can be significantly impacted by damage caused by residents to crops and livestock with fly tipping also being an issue. All development occurring in close proximity to farmland should be required to take this into account with appropriate measures (fencing, tree planting, and/or construction of earth bunds) to deter incursion being required.

Supporting Water resilience

Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes, but we have no specific suggestions at this time.

Question 86: Do you have any other suggestions relating to the proposals in this chapter?

Dorset CPRE – Response to Q86 - Supporting Green Energy and the Environment:-

Water in the Planning System

Our water infrastructure is under ever-increasing strain. Climate change and expanding population are increasing the chance of future floods, water scarcity and interruptions of supply. Our sewage treatment plants are increasingly unable to cope with rising demand and over exploitation of some sources, such as groundwater, is frequently leading to the degradation of the health of our rivers. Reliable and clean water supply is essential to the wellbeing of people, yet we waste a significant of our precious water through leakage and inappropriate and preventable usage. Our rivers and water courses are in a recognisably poor state of health. This is due to a past lack of investment in our sewerage systems and the rapid growth of both development and intensive farming in our countryside. We need to restore the health of our rivers for nature and pollution-free recreation.

A sustainable water system, which includes efficient use of water, reuse and adequate and well-maintained sewage treatment, is essential for the health of our rivers and security of water supply. Flooding is a major problem in most regions of the UK and is likely to get worse with climate change. A flooded house causes both financial and personal distress. Flooded fields cause farmers financial, and crop loses. It is essential that new developments should avoid flood prone areas. Downstream impacts can be mitigated through well designed and maintained sustainable drainage systems (SuDS). Natural flood alleviation systems should be adopted (EA now understand that many existing flood defence schemes have reached their limits and been over breached). Natural flood defences bring multiple benefits of protection, biodiversity increase and improved water quality. Our rivers are an iconic feature of our countryside as well as green corridors for nature. Access to green spaces is essential for our wellbeing. This is particularly true for urban area where canal and riverside pathways provide often the only green and wild places. These green corridors and access to them must be preserved at all costs.

This is a huge and multi-faceted problem and the pressures on water and causes of water pollution will vary across the country. Dorset CPRE, however, propose that some modifications to the planning system could have a significant impact on water usage and the safe disposal of waste across the country. These measures (below) might be enacted nationally, through a revised NPPF, building regulations and planning guidance, or locally, through Local and Neighbourhood Development Plans.

1. For any significant or impactful developments, whether housing or industrial, there should be a clear and demonstrated plan so that the water companies can confirm there is sufficient capacity for both water supply and sewage without overspill. Septic tanks are common in rural areas. Any new developments not connected to main sewers should have modern, high quality septic tanks with regular monitoring and maintenance.
2. Water Companies must be made statutory consultees on Local Plans and major or impactful planning applications should confirm that the infrastructure will be available for supply and treatment. Regulators and companies need to improve leakage reduction and coordinate with local authorities on leakage.

3. Any new water resource infrastructure (water recycling, water transfers, reservoirs, desalination plants etc) should have a robustly proven need and aim for zero damage to the environment and minimal damage to landscape and countryside.
4. Building Regulations should be updated to reflect climate change, future proof usage and aim to achieve water neutrality. For example:
 - A target water use of 100 lt/person/day should be mandatory.
 - Rainwater harvesting and usage should be mandatory. We should not be using drinking water to flush toilets. Grey water recycling should be made a goal for all new developments.
 - Low use showers should be mandatory
 - SUDS should be implemented on all new developments. Still not passed in England
 - No new development within 20 meters of a water course unless measures are put in place to control sewerage and rainwater drainage.
5. Building on flood prone areas (such as flood zones 2 and 3) should not be allowed. Flood plains should be used as part of natural flood defences and are exceptionally good at slowing river flow down.
6. Nutrient Neutrality is desirable but this should be balanced with housing needs. Smaller developments should be exempt or neutrality be funded by S-106 money.
7. Local Nature Recovery Strategies insofar as they relate to river quality and water resources are fully considered in the planning process.

CPRE supports large scale land use planning. Such planning must include planning for sustainable water, including planning for secure water supply, the protection of rivers, streams and water courses from pollution and the development of natural catchment based solutions to flood protection.