



The countryside charity  
Dorset

**Dorset CPRE**

October 2025

## **Dorset CPRE - Response Dorset Council Reg 18 Local Plan Options Consultation**

### **Executive Summary**

Dorset CPRE thanks Dorset Council for the opportunity to respond to this important consultation and looks forward to continuing to work constructively as a key stakeholder concerned with protecting and enhancing the Dorset countryside and helping our communities to thrive.

While Dorset Council's Vision and Strategic Priorities must sit within the framework of national planning policy, Dorset CPRE believes it is essential that the Local Plan be realistic, deliverable and sound. Dorset needs a Local Plan that identifies appropriate locations for new housing and employment while reflecting the county's unique environmental, landscape, and infrastructure constraints. Such a plan must meet the genuine, evidenced housing needs of Dorset's communities—not arbitrary central targets—while protecting the rural character, natural beauty, and biodiversity that define the county.

In the Council's 2021 Local Plan consultation, over 9,000 respondents expressed their desire for a realistic, sustainable and deliverable plan which supports communities and countryside alike. Those voices remain relevant today.

Government housing targets derived from the "standard method" would lead to an unsustainable and undeliverable plan. Targets of around 3,300 homes per year (55,000 over the plan period) far exceed Dorset's historic delivery rates—averaging just 1,300 homes per year over the past two decades—and would overwhelm local infrastructure. Developers build only what the market can absorb, and Dorset's constrained geography and infrastructure make such levels of growth implausible. A plan attempting to meet these targets would fail the housing delivery test, triggering the Government's "presumption in favour of sustainable development" and allowing speculative, developer-led expansion across rural Dorset.

Dorset Council has itself recognised that these national targets are unrealistic. Dorset CPRE strongly supports the Council in pursuing a locally justified housing figure based on Dorset's environmental capacity, infrastructure limitations, and genuine housing need including for truly affordable homes for local people.

In support of this, we welcome Dorset Council's decision to commission, jointly with BCP, an up-to-date assessment of Dorset's housing need. This work, together with new evidence such as the Green Belt Review and site assessments, should inform a revised Regulation 18 draft Local Plan that is realistic and environmentally responsible.

A recent Parliamentary Question to Planning Minister Matthew Pennycook MP, from Dorset MP Vikki Slade, elicited an important clarification of national policy. The Minister confirmed that Local Authorities "should make an assessment of the number of new homes that can be provided in their area... justified by evidence on land availability, constraints on development such as National Landscapes and areas at risk of flooding, and other relevant matters. Local Plans should be

deliverable, based on proportionate evidence, and consistent with national policy. Plans should also take the views of local people into account.”

This guidance provides Dorset Council with a clear mandate to plan for what is achievable and sustainable, not what is theoretically required by a national formula.

To assist this process, Dorset CPRE commissioned Jo Witherden MRTPI to review some of the Council’s proposed development sites. Her professional assessment demonstrates that many of the proposed allocations are neither sustainable nor suitable for development. Across locations such as Dorchester, Crossways, Broadmayne, West Knighton, Lytchett Matravers, Lytchett Minster and Sturminster Marshall severe environmental and infrastructure constraints make the proposed housing numbers undeliverable, unsustainable and inappropriate. The same constraints also apply in our view to sites at Bridport, Blandford, Colehill, Longham, Sherborne and West Parley.

Key concerns include:

- **Infrastructure Deficits:** Roads, junctions, drainage systems, and public transport networks are already overstretched. Many proposed sites are distant from employment centres, schools, and services, including already over-stretched health services, fostering car dependency and congestion.
- **Environmental and Landscape Harm:** The loss of high-quality farmland, damage to the Dorset National Landscape, and threats to Green Belt and conservation areas are significant and, in many cases, irreversible.
- **Flood and Pollution Risks:** Groundwater vulnerability, surface water flooding, and phosphate/nitrate pollution—especially in sensitive catchments such as Poole Harbour—pose major obstacles to sustainable development.
- **Unsound Settlement Expansion:** Strategic proposals such as the North Dorchester Garden Community and Woodsford new settlement would fundamentally alter the character of the countryside and are unsupported by credible infrastructure or transport evidence.

Dorset Council faces a profound challenge: how to produce a sound and deliverable Local Plan that genuinely reflects Dorset’s environmental capacity, infrastructure limitations, and statutory duty to protect its National Landscapes. The county’s geography—dominated by protected landscapes, flood plains, and constrained transport corridors—demands an evidence-based and proportionate strategy, not one driven by abstract and unrealistic housing numbers.

Dorset CPRE’s position is therefore clear. We support a realistic, locally justified Local Plan that:

- Meets Dorset’s genuine housing and employment needs;
- Includes assured provision for truly affordable housing for local people in the form of social rent;
- Protects the countryside, Green Belt, and National Landscapes;
- Directs growth to only proven sustainable locations with robust existing infrastructure;
- Adopts a Brownfield First approach; and
- Embeds at its core and is wholly consistent with clear climate, nature recovery, and net zero policies.

In conclusion, Dorset CPRE urges Dorset Council to develop a Local Plan that reflects what Dorset can sustainably deliver, not what national targets demand. The Local Plan must be sound, evidence-based, and faithful to Dorset’s landscape and community character. We remain ready to work constructively with the Council and its officers to help achieve that outcome.

## **Chapter 2 - Vision and Strategic Priorities**

### **Question 1: Do you have any comments on the proposed vision for Dorset?**

Dorset CPRE welcomes Dorset Council's ambition that Dorset will be a, "fairer, more prosperous and more sustainable place for current and future generations," and its recognition of the importance of the environmental quality of the area.

However, we believe that the vision for Dorset can be more ambitious and should recognise the threats and opportunities posed by the Climate and Nature Emergencies. The Vision should also reflect the strengthened duty to further the purposes of Protected Landscapes as introduced in the Levelling Up and Regeneration Act 2023. Dorset's Natural Landscapes cover 52% of the county, they are a huge asset and should be recognised as such in the vision for the county.

It is essential that new developments are not only high quality, well designed and accessible, but also that they are future proofed and designed to be Net Zero both in terms of operational carbon and embodied carbon.

We welcome the stated intention to provide sustainable travel opportunities from the villages to the major economic centres, many of our rural settlements are inadequately served by public transport forcing car dependency.

Dorset is blessed with an abundance of Wildlife not found in other parts of the UK and is home to over 450 protected or rare species of wildlife, this should be recognised in the vision for the county and ambitious targets set for its protection. Dorset has the potential to play a key role in contributing to meeting the Government's ambitious targets to protect 30% of land and sea for nature by 2030 (30by30) which should be reflected in the vision for the county.

In our opinion the vision for the county is unlikely to be achieved should a plan based on delivering the Government's housing target of 55,000 new homes over the plan period be adopted. Development on this scale is simply not sustainable for Dorset.

### **Question 2: Do you have any comments on the proposed strategic priorities for the Local Plan?**

We have the following comments relating to the proposed strategic priorities for the local plan:-

#### **a. Provide affordable and high-quality homes**

Dorset CPRE support the Council's strategic priority to provide affordable high-quality homes, these must include homes for social rent. These homes must be truly affordable, matching local incomes, with mortgage lending ratios being no more than three times the annual income for a two person household and rents no more than 35% of average local net household income, unless 80% of the market rent would be cheaper. This approach would ensure that rent levels are actually aligned with what is affordable for local people on lower incomes, and would prevent rents in lower-demand areas from increasing if the 35% threshold happened to be above typical market rents for those location.

All new homes must be not only high quality, accessible to all, but designed to be net zero in terms of operational carbon by 2027, following recognised standards such as LETI and RIBA

2030. There should also be ambition for new homes to be net zero in terms of their embodied carbon. Without this clarity, Dorset risks locking in decades of high-carbon housing. Retrofitting existing homes should also be identified as a strategic priority given the scale of the challenge. The UK's Climate Change Committee (CCC) has stated that retrofits will need to increase to the rate of one million per year by 2030 to meet the UK's net zero target.

**b. Grow our economy**

Dorset CPRE supports the Council's aim to enable sustainable economic growth by focussing the provision of employment space on the most sustainable towns. Before allocating new employment land, the strategy should prioritise modernising and repurposing existing sites. For example, Winfrith, has the potential to become a leading centre for Net Zero Innovation. In order to achieve sustainable economic growth it is essential that there is investment in digital connectivity, sustainable transport, and skills training.

In the rural areas we would like to see support for small-scale, community-led enterprises that support local services, sustainable farming, nature-based tourism, and contribute to the County's vibrant rural communities.

**c. Communities for All**

The Plan must go beyond housing numbers to ensure genuinely sustainable communities. Strategic priorities should address:

- **Truly Affordable, well-located homes** tied to local need rather than speculative development.
- Investment in **sustainable transport corridors** to reduce car dependency.
- **Local services and infrastructure** delivered in parallel with housing.

**d. Responding to the climate and nature emergency**

Dorset Council has not yet done sufficient work to ensure the sustainability of the proposed plan in relation to Dorset Council's declared climate and nature emergencies. The Council must demonstrate the proposed Plan's compatibility with a) carbon reduction targets, and b) the '30by30' national and international commitment, also to be incorporated into the statutory Dorset Local Nature Recovery Strategy, to protect 30% of land and sea for nature by 2030.

**Resilience to climate change**

The Strategic Priorities should explicitly include **adaptation** to climate risks such as flooding, water stress, and overheating. Design standards must ensure Dorset's future housing stock is resilient, affordable to heat and cool, and provides long-term health and wellbeing benefits.

**Protecting Natural Capital**

The protection and restoration of Dorset's outstanding landscapes, biodiversity, and agricultural land must be explicit. Strategic priorities should commit to:

- **Protecting Green Belt and sensitive landscapes** from inappropriate development.
- Delivering **net gains for biodiversity** and supporting the Local Nature Recovery Strategy.
- Integrating **Green Infrastructure** as a core requirement in all new development.

## **National Landscape/AONB**

The Council needs to demonstrate the Plan's consistency with the 2024 statutory duty on local authorities and other public bodies to further the purposes of the National Landscape which include to protect and enhance the natural beauty of the area, to protect and restore wildlife and habitats, and to protect the area's heritage.

### **Chapter 3 - The Strategy for sustainable development**

**Question 3: The proposed settlement hierarchy lists the towns and villages that will be the focus for new homes. Are there other settlements where we should plan for new homes? Do you have any comments on whether a settlement is in the right Tier or not?**

Dorset CPRE acknowledges the need for a settlement hierarchy where development is steered away from the smaller villages and open countryside towards those settlements best able to sustain development. It is important in assessing the sustainability of locations that objective c, the environmental objective, of sustainable development (to protect and enhance our natural, built and historic environment), as set out in the National Planning Policy Framework, is not forgotten about and taken into consideration. Notably, The Tier 1 settlements of Upton and Corfe Mullen and the Tier 2 settlements of Ferndown and West Parley, St Leonards and St Ives, Verwood, West Moors and Wareham, Wimborne and Colehill, are all in the vicinity of Dorset's internationally important Heathlands. Population growth in these settlements would put unacceptable pressure on these sensitive valuable natural habitats.

The settlement hierarchy provided suggests that development in the county should be focussed primarily on Tier 1 settlements, with the lesser amounts being proposed for Tier 2 and 3 settlements. However, an analysis of the Opportunity Sites in Annexe A, shows that a significant number of large development sites are proposed for the less sustainable Tier 3 settlements, with fewer being proposed for the more sustainable Tier 2 settlements. These settlements do not have the infrastructure to cope with the levels of development being proposed, in terms of healthcare facilities (Government guidance\* on new homes and healthcare facilities states that 5 full time GPs are required to provide healthcare services for a population of 9000 people, equivalent to 3,800 homes based on the average national household size), and school places. Additionally, as they are relatively distant from major settlements, car usage will be main mode of transport, not sustainable transport as desired in Section 9, paragraph 109 of the NPPF.

\*Homes England. Fact Sheet 4: New homes and healthcare facilities

**Question 4: Do you have any comments on the proposed strategy for the south eastern area?**

Dorset CPRE has serious concerns about and rejects the Local Plan Sites consultation's characterisation of the South Eastern Dorset Area (SE Area) as effectively a commuter and dormitory area for the conurbation. This leads in turn to Dorset Council's proposal that the SE Area could be asked to accommodate the highest number of new houses of all the Dorset Areas.

This is an erroneous characterisation and a very misguided, sweeping generalisation about an area which includes much of the former Purbeck District Council area, with its large extent of Dorset National Landscape [recognised in the 2018 Glover Report as part of a wider Dorset candidate National

Park], the Isle of Purbeck with the UNESCO World Heritage Jurassic Coast and the UK's first extensive Super National Nature Reserve [the Purbeck Heaths Super NNR, an area which contains the highest biodiversity anywhere in the UK, soon to be followed by the Purbeck Coast Super NNR], and its heritage towns, villages and landscapes with many scheduled monuments and other cultural heritage features.

Beyond the Dorset National Landscape, much of the SE Area is designated Green Belt, a well-justified designation which has fulfilled and should continue to fulfil Green Belt purposes. Rather than being proposed for de-designation to enable extensive proposed development, the Green Belt area of SE Dorset and its communities should be better protected and respected to prevent unsustainable and inappropriate urban sprawl in this area of rural Dorset.

We see no reason why Blandford and many of its surrounding villages have been included in the "South Eastern Dorset Area" other than to support the need for houses in the area south of the Green Belt in the BCP conurbation. It was the administrative seat of North Dorset for many decades, and is culturally and geographically linked to the Blackmore Vale to the north. It is a market town that provides services for both north and central Dorset. The area around Blandford is also part of Northern Area Planning for planning purposes, so it would be illogical to move it for the purposes of the Local Plan.

There is concern that Blandford will become a dormitory town for the BCP area. Further development in the Blandford area will result in greatly increased volumes of traffic on the A350, which is already congested at peak travel times. This will be contrary to the Council's Strategy set out in the Consultation Document "...to direct development to sustainable locations to reduce travel distances " (Local Plan Consultation 1.5.7).

Some of the Opportunity Sites proposed are incoherent and inconsistent with any sensible strategy for the Area. The Bulbury site is over 4 km from Lytchett Matravers (the nearest grocery store) and 6 km from Upton. The Sturminster Marshall sites are completely inaccessible from Upton by walking or cycling, have no local GP surgery and no local secondary school. They are remote from any significant employment centres. The smaller sites in Lytchett Matravers and the sites adjacent to Lytchett Matravers (mapped as Lytchett Minster/Upton) are inadequately served by public or active travel options, and unsustainable. The wholly inappropriate and disproportionate scale of development proposed would overwhelm these two communities, the historic conservation village of Lychett Minster and destroy good farmland, attractive landscape and well-functioning Green Belt. Neither Sturminster Marshall nor Lytchett Matravers is a sustainable location for development.

#### **Question 5: Do you have any comments on the proposed strategy for the central area?**

Dorset CPRE acknowledges the economic importance of the Dorchester - Weymouth- Portland Hub, however economic growth in this area is hindered by the inadequate road and rail network. We agree that the Dorset Innovation Park at Winfrith has untapped potential for continued growth. With support from the Council the site could become a flagship Net Zero Innovation Hub, anchoring Dorset's green economy by:

- Supporting prefabricated Modern Methods of Construction (MMC) to supply sustainable housing materials across the county.
- Creating high-quality jobs in low-carbon manufacturing, engineering, science, and digital design.
- Attracting collaboration between universities, local SMEs and national innovators.
- Reducing embodied carbon in construction by producing locally sourced and prefabricated components, cutting reliance on long-distance supply chains.

As recognised by the Council, the area has an extremely beautiful environment. The National Landscape (better described as an Area of Outstanding Natural Beauty) and the Jurassic Coast World Heritage Site are unique and should be protected at all costs. They are vitally important internationally and nationally. Included sites for conservation are Maiden Castle, The Fleet, Dorset Heathlands and many, many more. It is this intrinsic nature of the area that attracts tourists, the benefits of which should be better recognised in the strategy. The coast is renowned for its sailing with the Weymouth and Portland Sailing Academy in Weymouth harbour hosting the Olympic Sailing Events in 2012, this represents a huge asset to the area which should be nurtured and supported.

Focussing green energy investment/production in this area, as proposed in paragraph 3.4.5, is highly inappropriate. Large scale solar and on-shore wind farms will cause huge damage to this internationally and nationally important landscape, not only harming the environment but also impacting on the important tourist economy. We support policies that encourage micro-generation of renewable energy through the placement of solar panels on roof tops.

Significant investment in transport infrastructure to the area is required, currently the rail connections are only moderately good. The road from Portland, through Weymouth to Dorchester is almost always crowded and will remain so despite widening and other strategies (as already seen). It is a cul de sac. Much could be done to improve the current network of cycle tracks.

Weymouth town centre would certainly benefit from regeneration - at present it is becoming deserted with businesses moving out (and therefore increasing dependence on the car). The proposed area to the North of Dorchester is far from ideal. It is too large with poor road links, environmental damage, putting severe strain on an already overstretched NHS, not enough schools, parking, flooding risk, on a site of SSI, soulless destruction of rich historical heritage and not enough truly affordable houses. It is likely that the majority of the in-comers would be retirees and second home owners.

### Comments on the Dorset Clean Energy Super Cluster

1. We fully support the proposed Dorset Clean Energy Super Cluster that includes deployment of Small Modular Reactors at Dorset Innovation Park and offshore wind turbines in the English Channel outside Lyme Bay. (para.3.4.6).
2. LUC acknowledges a limited view when it suggests that ground-mounted solar photovoltaic technology has the largest technical potential energy output in Dorset (Dorset Renewable Energy Assessment, para. 4.67, p.55, LUC September 2025). We would like to question this.
3. A high estimate for Dorset's electricity consumption in 2050 is 3,940 GWh of which 470 GWh is estimated to have been generated from operational renewable energy sources in Dorset in 2024.
4. For the balance of 3,470 GWh to be supplied by ground-mounted solar photovoltaics would require 6,779 ha of development land, equivalent to 10,592 standard 100 m x 64 m adult FA football pitches<sup>1</sup>. **The resulting damage caused to Dorset's outstanding landscapes and farmland by this deployment would be disastrous.**
5. It can be claimed that 3,470 GWh could be supplied by a single Rolls Royce Small Modular Reactor occupying a 2.15 ha development site at Winfrith. This has the potential to generate an annual 3,911 GWh of low carbon electricity<sup>2</sup>. **This would cause minimal damage compared with deployment of ground-mounted solar photovoltaics.**

6. A second more acceptable alternative is annual generation of up to 5,057 GWh of renewable electricity from 1.65 GW of installed capacity anticipated for the proposed PortWind offshore wind project planned to be located in the English Channel 22 km (14 miles) off the coast at Weymouth<sup>3</sup>. **Again, this would cause minimal damage compared with deployment of ground-mounted solar photovoltaics.**
7. Although Dorset CPRE does not favour large ground-mounted solar photovoltaics, we have for many years enthusiastically supported community renewable energy projects of all types and roof-deployment of solar photovoltaics of all types and we will continue to do so.
8. It can be noted that when compared with roof-mounted solar photovoltaics, large standalone ground-mounted solar photovoltaic installations:
  1. Can give rise to higher transmission losses.
  2. Take-up more of the diminishing available capacity on local and distribution networks.
  3. Do not allow or are not conducive to wilding, tree growing or agricultural practices.
  4. Are more damaging to Dorset's highly valued landscape, heritage, farming and amenity assets.
  5. Are less financially beneficial to local residents, businesses and communities that invest in their own installations.

**Ref.1.** The assumptions for this are to deploy, as an illustration, 13.2 million Sanyo HIT- 250E01 solar photovoltaic panels, with an IC of 250 W, dimensions 1.610 m x 0.861 m (an output of 180.3 Wm<sup>-2</sup>) and an LF of 12%. The average area occupied by solar photovoltaic panels within 48 planning approved ground-mounted solar photovoltaic development sites in Dorset is 27%. This has been taken into account to arrive at the total development site area of 6,779 ha, as reported above at para.4.

**Ref.2.** RR claims its SMR has an installed capacity (IC) of 470 MW, a load factor (LF) of 95%, a development site area of 2.15 ha (5.3 acres) and a working life of 60 years.

**Ref.3.** Developer Source Galileo has secured a 2.5 GW National Grid connection to the Chickerell 400 kV substation, near Weymouth. 1.65 GW of this is reserved for the PortWind offshore wind project. An IC of 1.65 GW has the potential to generate an annual 5,057 GWh with a Load Factor of 34.99%. A Memorandum of Understanding (MOU) to jointly progress the project was signed by Source Galileo and Portland Port on 10 February 2025. The project is in the early stages of development and turbine details remain to be decided. The Rampion 2 offshore wind project in the English Channel, that is being managed in Newhaven at East Quay, received planning consent on 4 April 2025. 325 m high turbines with an IC of 13.3 MW were chosen for this project. As an illustration, if the same turbine was chosen for the PortWind project, it would require **124 x 13.3 MW IC turbines** to have a total IC of 1.65 GW.

**Ref.4.** Dorset Renewable Energy Assessment, Table 4.3, p.53, September 2025, LUC. (3,470 GWh is 3.8% of Dorset's total ground-mounted solar photovoltaic technical resource of 90,489 GWh).

## Data Sources

1. Large-scale electricity storage, The Royal Society, 8 September 2023.
2. Digest of UK Energy Statistics (DUKES), 31 July 2025, Department of Energy Security and Net Zero (DESNZ).
3. Solar Photovoltaics Deployment, 25 September 2025, DESNZ.
4. Quarterly FIT Installations Report (for installations below 5 MW), 6 June 2025, DESNZ.
5. DUKES, Table 6.3 (Load Factors), 31 July 2025, DESNZ.



6. Subnational Electricity Consumption Great Britain 2003-2023 and Northern Ireland 2015-2023, 19 December 2024, DESNZ.
7. Renewable Energy by Local Authority 2011-2023, 31 October 2024, DESNZ.
8. Energy Trends, Table 5b, 26 June 2025, DESNZ.
9. Energy Trends, Table 6.1, 26 June 2025, DESNZ.
10. Renewable Energy Planning Database (REPD) Quarterly Extract, 20 August 2025, DESNZ.
11. Dorset Council Planning Application Database.

**Question 6: Do you have any comments on the proposed strategy for the northern area?**

North Dorset has experienced high levels of housing development in recent years, resulting in harm to the distinctive landscape and countryside, as well as increasing traffic congestion and worsening infrastructure provision. The worst affected town has been Stalbridge, which has no doctor's surgery at all. There are no real plans to improve transport, with road links poor and good public transport a distant memory. There is certainly little in Dorset Council's (DC) draft Transport Plan that will help, and employment prospects remain weak. Few would recognise the optimistic tone in DC's description of the area's economy. The Local Plan (LP) talks of the "strategic rail and road corridor" in the Northern area, but one might ask how the A30 between Yeovil and Salisbury, with only four miles of dual carriageway, could be considered a "strategic road corridor"? Further substantial housing development will impact negatively. The expectation that more executive homes will be built rather than genuinely affordable housing will attract incomers, distorting further the ageing demographics, and not help young residents on low salaries.

Villages such as Bishop's Caundle, Marnhull and Motcombe seem to have been hit disproportionately hard with extensive "opportunity" sites in this draft LP that will destroy the character and individuality of their communities. We are also concerned about DC's idea of "flexible settlement boundaries" which could badly affect North Dorset and the integrity of its communities, with its relatively dense patchwork of villages often connected by tiny lanes. A recipe for ribbon development and traffic gridlock? We have conceded that Gillingham may be able to take some new sites, given its good transport links, despite the harm to heritage and infrastructure it will cause. Whilst Sherborne has a very significant allocation, with over 2,000 new homes suggested, the landowner has indicated any development will be master planned and not by piecemeal sale of land. Our local CPRE group will be working with them on this and preliminary discussions have already commenced. The only town that has not been allocated much new housing in this Local Plan is Sturminster Newton, which could more easily absorb it than others.

We also question the artificial division of Dorset into four new quadrants, which have no relationship to historic boundaries. North Dorset was historically the area of the Blackmore Vale, as well as some of the downland bordering it on the south, with its strong agricultural traditions, and its market and gateway towns, but this division cuts off its southeastern part. It is perceived that Blandford and most of its surrounding villages are now being included in the "South East Dorset Functional Area" to support the need for houses in the area south of the Green Belt in the BCP conurbation. It was the administrative seat of North Dorset for many decades, and is culturally and geographically linked to the Blackmore Vale to the north. It is a market town that provides services for both north and central Dorset. The area around Blandford is also part of Northern Area Planning for planning purposes, so it would be perverse to move it for the purposes of the LP.

There is concern that Blandford will become a dormitory town for the BCP area with greatly increased volumes of traffic which will fly in the face of Dorset Council's strategic policy "....to direct development to sustainable locations to reduce travel distances" (Local Plan Consultation 1.5.7).

### **Question 7: Do you have any comments on the proposed strategy for the western area?**

As acknowledged in paragraph 3.6.1, the natural environment of Western Dorset is one of its greatest assets. It is the reason why tourists are attracted to the area and why residents value its quality of life. This landscape, recognised nationally for its exceptional beauty, underpins the local economy through tourism, agriculture and the creative industries.

Significant numbers of potential development sites are proposed for the Western Area situated either in, or adjacent to the National Landscape. The greatest number are proposed for Bridport with approximately 136 ha of development sites surrounding the town, all on green field sites in the Dorset National Landscape. Delivering large scale development as proposed in this extremely sensitive area would irreversibly damage its intrinsic natural beauty and character, undermine its biodiversity value, and have a huge environmental impact, contrary to the principles of the Dorset Local Nature Recovery Strategy. It would also risk eroding the setting and distinctiveness of Bridport and nearby settlements, putting off tourists and increasing traffic congestion through the town, the coast and along the A35.

Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 amended the duty of relevant authorities to 'seek to further' the statutory purposes of Protected Landscapes, "*to conserve and enhance their natural beauty, wildlife, and cultural heritage and to promote opportunities for public understanding and enjoyment of these special qualities.*" Delivering housing on the scale proposed conflicts directly with this statutory duty.

The proposed strategy should instead prioritise:

- Focusing development within existing urban boundaries or on previously developed land (Brownfield land);
- Supporting smaller-scale, locally led affordable housing schemes, like Hazelmead that meet local needs without undermining landscape character; and
- Promoting low-carbon retrofit, reuse of existing buildings, and higher densities in less sensitive locations.

In summary, the strategy for the Western Area, as currently drafted, is inconsistent with national policy (NPPF para. 182), the Levelling-up and Regeneration Act 2023, and the Council's own environmental objectives. A revised approach should reflect the principle that protected landscapes are not appropriate location for major development except in exceptional circumstances - and those circumstances have not been demonstrated here.

### **Question 8: Is there any important infrastructure that needs to be delivered alongside new homes in the Western/Central/South Eastern/Northern area?**

It is important that where the existing infrastructure is not in place to support future levels of proposed development that this is established prior to the construction of new homes. Far too often the infrastructure required to support new homes is delivered retrospectively leaving occupiers struggling to access public transport, school places, and healthcare services.

Currently healthcare provision within the county is stretched. The Dorset Echo reported in August 2025 that the county has the second longest GP wait times in England, with many patients having to wait for more than 28 days for an appointment. It is essential that increased investment in healthcare provision occurs to ensure sufficient GPs and hospital beds to meet the needs of the population.

The transport infrastructure within the county is poorly equipped to cope with the levels of development proposed. Significant levels of development are proposed for East Dorset, whose road

network is already at capacity. Consideration also needs to be given to the ability of the A350's capacity to accommodate the additional traffic.

The NPPF seeks to encourage development to be focused on locations, which are, or that can be made sustainable through limiting the need to travel and offer a genuine choice of transport modes. Currently access to public transport is inadequate for many communities, we would like to see this improved for all, and the decline in bus services to rural areas reversed. To meet this requirement and encourage active travel, investment is required in establishing, improving and maintaining cycle paths, pavements and footpaths in the county. Precedence should be given to those settlements where railway connections are available. We would like to see initiatives that reduce carbon emissions and promote low-carbon modes of transport.

#### **Chapter 4: Housing Delivery Strategy**

**Question 9: The Local Plan sets out a strategy to meet the area's housing needs through allocating sites for new homes, the flexible settlements policy, new settlements and the efficient use of land. Are there any other measures that could help meet housing needs?**

Dorset CPRE welcomes Dorset Council's decision to commission jointly with BCP an up to date assessment of Dorset's housing need. We note that, in response to a Parliamentary Question on Local Plans by Dorset MP Vikki Slade, Planning Minister Matthew Pennycook stated that Local authorities "should make an assessment of the number of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development, such as National Landscapes and areas at risk of flooding, and any other relevant matters.... Local Plans should also be deliverable over the plan period, based on proportionate evidence, and consistent with national policy. Plans should also take the views of local people into account." This helpful policy statement supports Dorset Council in developing a Local Plan which is realistic, **deliverable**, evidence-based and which serves the needs of our communities and countryside.

In theory we support proposed policy measures to optimise levels of development on sites in the most sustainable locations. However, this should be at a level that is appropriate and proportionate to the existing size of the settlement and supported by local people.

The introduction of a policy to use planning conditions to ensure that consented schemes are built out in a timely manner is welcomed. This will be essential to ensure that permissions granted contribute towards meeting the housing delivery test.

In addition, we would like to see measures that ensure that the viability of development proposals is established before the grant of planning consent. It is essential that truly affordable housing that meets key workers in the county is actually delivered on major development sites in line with policy and not reneged on by developers post granting of consent.

We do not support the introduction of a Flexible settlements policy for those settlements in Tier 1, Tier 2, and Tier 3.

**Question 10: To what extent do you agree or disagree with the Plan including a lower housing target for the first few years and a higher figure towards the end of the plan period to meet housing needs?**

- a) Agree**
- b) Disagree
- c) I have another suggestion

Dorset CPRE acknowledges the merit of introducing a stepped approach towards meeting the county's housing requirement over the plan period. This could help facilitate Dorset Council in satisfying the Housing Delivery Test and retain control of decision making.

**Question 11: Where should a policy allowing sites for only affordable homes apply?**

- a. All of Dorset
- b. Only around those towns and villages listed in the proposed settlement hierarchy**
- c. Only in the Green Belt

Dorset CPRE welcomes the recognition that there is a significant need for truly affordable housing within the county especially in rural communities where local people find themselves priced out of the villages. The lack of homes that ordinary people can afford to live in is destabilising the county's communities forcing young people to move away, making it difficult for key workers and employees to find homes close to their jobs. It is essential that affordable homes are provided where they are needed in consultation with communities, "the right home, in the right place." Community Land Trusts and other Community led organisations can be instrumental in ensuring that this is achieved.

#### **Chapter 5: Flexible Settlements Policy**

**Question 12: We have suggested that the Local Plan will not include clear boundaries to define the edges of towns and villages. Instead, the flexible settlements policy would allow new homes to be built around certain towns and villages. How much do you agree or disagree with this approach?**

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree**

**Please provide any further comments or reasoning...**

Dorset CPRE has serious concerns that the proposed **Flexible Settlements Policy** risks encouraging unsustainable, speculative development in rural areas, damaging and compromising communities which risk losing their sense of identity, and undermining both Dorset's countryside and its climate commitments.

Dorset CPRE strongly opposes Dorset Council's proposal to remove settlement boundaries under a so-called "flexible settlement policy." We do not attach weight or credibility to the Council's suggested safeguards (that only developments up to 30 houses in any one development would be envisaged, and that communities with up-to-date Neighbourhood Plans which provide for

development could be excluded.) Settlement boundaries have for years enabled communities to prevent development sprawl in the countryside, and we wish to see these boundaries continue.

Clear risks inherent in any flexible settlements policy and removal of boundaries include:

1. There is already ample evidence that “flexibility” would be interpreted by developers as a licence to promote **sites in inappropriate locations**, especially where infrastructure is lacking. Dorset’s smaller settlements often lack schools, shops, healthcare, and public transport — placing housing here would increase car dependency and impose unsustainable pressures on local services.
2. Multiple small-scale developments would imply **cumulative impact and harm** on settlements, the countryside, biodiversity, and landscape character, and lead to the creeping urbanisation of rural Dorset.
3. There is a clear risk that flexible settlements policy would **undermine climate and sustainability policies and priorities**, including net zero carbon design and energy standards, access and proximity to public transport and active travel routes, and the contribution of landscape, natural heritage and farmland to nature recovery, climate mitigation, food production, green infrastructure and health and wellbeing.

While Dorset Council might seek to limit harm arising from flexible settlements policy by various means, we call on the Council not to pursue this proposal but to make clear that settlement boundaries will continue, as communities have indicated this wish.

**Question 13: We propose that the flexible settlements policy will include a limit of 30 homes per site. To what extent do you agree or disagree with this threshold?**

- a. The limit of 30 homes is about right
- b. **There should be less homes**
- c. More homes per site should be allowed

**Please explain your reasoning.**

Dorset CPRE does not support this policy and believe that development sites outside of the settlement boundaries should not be countenanced.

**Question 14. At a town/village, should one flexible settlement policy site be started before another one is permitted?**

- a. Yes
- b. **No**

**Please provide further comments**

Dorset CPRE does not support this policy. However, should the policy be introduced there should be a restriction as to the number of sites allowed around in the vicinity of a settlement and consent should not be granted prior to completion/build out of previously consented sites. We note that in relation to exception sites for community development the NPPF Paragraph 76 b) requires that sites should be proportionate. Should multiple sites adjacent to a settlement be consented this could result in disproportionate expansion of settlement. This could cause unacceptable harm to the existing community etc. as set out in response to Question 12.

**Question 15: We have suggested that the flexible settlements policy will only apply to the areas around certain towns and villages, these are those ranked as 'Tier 1, Tier 2 or Tier 3' in our settlement hierarchy. What do you think about the locations where we have suggested that the flexible settlements policy should apply?**

Dorset CPRE does not support this policy.

**Question 16: We have suggested that the flexible settlement policy should only be applied around the 'continuous built up areas' (i.e. densely populated areas with high concentrations of buildings, infrastructure and paved roads') of certain towns and villages. Do you have any comments on our definition of this 'continuous built-up area'?**

**Please provide any further comments or reasoning....**

Dorset CPRE does not support the introduction of the flexible settlement policy and it should not be applied to any of the settlements in the county.

**Question 17: We have suggested that the flexible settlements policy should not be applied in the Green Belt. What are your thoughts on this?**

Dorset CPRE opposes the introduction of a flexible settlements policy and the removal of settlement boundaries for any settlement in the Dorset Council area, including the Green Belt. See our answer to Question 12.

**Question 18: Away from the towns and villages listed in the settlement hierarchy, there may be types of development that we could support. Do you have any comments on this approach and on the types of development that could be supported in the countryside?**

It is essential that any development in the countryside must be sensitive in their scale and purpose to the distinctive character of their surroundings, reflecting the topography, geology and historic patterns of land use and settlement. Policies should support the re-use of agricultural buildings, particularly where it facilitates the growth of the holding's agricultural/horticultural business. The development of community renewable energy projects should also be supported.

The Council does not mention whether it intends to retain the Rural Exceptions policy, Dorset CPRE would like to see this policy retained, as facilitates the delivery of community led affordable housing.

**Question 19: We have suggested that the flexible settlements policy should not be applied in places with a recently made neighbourhood plan which includes allocations for new homes. What are your thoughts on this?**

As mentioned previously Dorset CPRE does not support the introduction of the flexible settlements policy. Should it be introduced, it should not be applied to those settlements where a neighbourhood plan is in place.

## **Chapter 6. Employment Strategy**

**Question 20: The Local Plan will retain and protect existing key employment sites, identify new employment sites at locations close to more sustainable settlements, allow for expansion of existing employment sites and allow for new employment sites in suitable locations. Do you have any comments on this approach?**

The economic development plan published earlier in 2025 and preceded by the last Local Enterprise Partnership (LEP) report indicates those areas of the economy that the council wishes to develop. These are aspirational plans but we presume that they are being actioned and possible employers being canvased on their businesses being involved in moving the plan forward. If this is the case, how do the site allocations fit with where the owners see their businesses operating? A current site singled out is the Dorset Innovation Park at Winfrith Heath where specific businesses are being encouraged to locate. Similar practice should follow at other locations. It is better for the allocation to be made once there are businesses who wish to be in that location. Speculative land allocation could well lead to sites being set aside taking up valuable green space, probably currently existing farm land for no purpose.

Any land allocated should be capable of housing a variety of different sized businesses. For example new startups often require smaller premises, on flexible lease terms. So specific startup hubs will be needed. Maybe the full plan will give an indication of the breakdown related to size of buildings?

It isn't clear how much of the existing employment land is underused and how much space is currently vacant. It is also likely that the provision of new sites can lead to relocation of businesses from elsewhere. It is not clear if all potential brownfields sites locally have been assessed for re-development. It is our experience that in a number of locations, where offices have closed, the buildings are converted for residential use. With the rapidly changing business and employment patterns will large allocations of sites over 17 years actually be viable?

We note also that there are other types of employment which are probably not expected within the sites option namely, education and health facilities, accommodation for the elderly, and convenience stores. See comments in Q22.

**Question 21: The Local Plan will enable employment land to be developed outside identified sites at certain towns and villages, subject to certain considerations. Do you agree with this approach?**

As mentioned in conjunction with the proposed flexible settlements policy we do not support the removal of settlement boundaries, or, development outside of existing settlement boundaries.

Elsewhere we have commented on the dangers of removal of development boundaries. Any such employment opportunities in locations shouldn't be outside such boundaries as we hope they continue to exist. There should be an opportunity for employment sites to occur, and neighbourhood plans may well indicate such. Brownfield sites and reuse of existing buildings as in 6.4.4 should be the preferred options.

**Question 22: We have suggested that larger scale housing sites should be required to provide land for employment uses. Proposals for 3000 homes or more would be mixed residential and employment developments, with a ratio of 0.25ha of employment space for every 100 homes. How much do you agree or disagree with this approach?**

- a. **Agree**
- b. Partially agree
- c. Neutral

- d. Partially disagree
- e. Disagree

**Please provide further comments or reasoning.....**

As mentioned in comment to Q20 the other employment opportunities relating to education, health, and older persons accommodation could be better located in residential areas as mixed use. Great care however needs to be taken with any development of any type of units so that they are integrated, designed and landscaped to be acceptable with the resident population. Ugly sheds should not be an option. Probably on larger sites there is a need for a convenience store.

**Question 23: We have suggested that the Local Plan should include policies to protect the most important existing 'key' employment sites.**

- a) Do you have any views on the strategy we have suggested for protecting employment sites?
- b) What criteria should we consider when defining 'key' and 'non-key' employment sites?

- a. Site size
- b. Location
- c. Employment use type
- d. Accessibility
- e. Contribution to meeting economic objectives/needs
- f. Market attractiveness
- g. Opportunities for growth/expansion
- h. The site's status in previous local plans
- i. **Other.**

a) Once identified and agreed protection of key sites is important particularly if it avoids development of other employment sites on greenfield land. However, care needs to be taken with other not as critical sites to ensure that this doesn't lead to continuous negative response to alternative use. This will be mentioned again in our response to the Town Centre section.

b) Other - when seeking to identify and define 'key' and 'non-key' employment sites it is important to consider occupancy rates/demand for the employment space on the site in question. Key sites will demonstrate strong occupancy rates.

## **Chapter 7. Town Centre Development**

**Question 24: How do you think we should plan to support town centres in the future?**

Town centres will continue to evolve with changing economic activity. A key is therefore to be flexible in approach. There will be mixed use and possibility of some premises changing to accommodation. If so this shouldn't just be for holiday lets. Our market towns all have historic high streets. It is vital that these are maintained and improved as far as possible. All such towns should be encouraged to have design codes which will provide very strong material considerations in any planning decisions. The Council should consider developing, in conjunction with the private sector, an enhancement fund so that buildings falling into disrepair can be given, at the very least, cosmetic renovation. We would support the ideas in the LP and Economic Development plans for having master plans for the Market Towns. However, these should be locally generated, supported by the Dorset Council and not plans



imposed on the Market Towns by Dorset Council. When out of town planning decisions are taken more consideration should be given to the Town Centre impact. See comments for Q26.

**Question 25: What types of use do you think will be most important for the future of our town centres?**

- a. Shops
- b. Cafes/restaurants
- c. Leisure (e.g. cinemas)
- d. Offices
- e. Cultural (e.g. museums)
- f. Community (e.g. libraries)
- g. Hotels
- h. Other

The order of importance will vary depending on the situation in each town centre. The provision of sports gyms in town centres is often popular. We would also like to see policies to encourage the re-use of vacant upper floors of retail premises to provide residential accommodation, this can help revitalise town centres and reduce crime levels.

**Question 26: We are suggesting that retail impact assessments should be undertaken for retail development proposals outside the town centres defined in the Plan, that are over the size of a small food store (280 square metres net). How much do you agree or disagree with the introduction of a threshold of 280 square metres for retail impact assessments?**

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

**Please provide any further comments or reasoning**

Town centres have been badly impacted by out of town developments and wherever possible these should now be avoided unless the impact can be shown as minimal. This will be important as the larger developments increase on the town edges. Ideally within the master plans for such development good and regular public transport such as electric buses should be running into the town centres. Any development on the housing sites should be of the convenience store nature.

**Question 27: Should the threshold apply to leisure uses that are net 280 square metres?**

- a. Yes
- b. No

**Question 28: We are considering whether the Local Plan should include a policy which supports interim or temporary uses pending a permanent use for vacant town centre building - we have called these 'meanwhile uses'. To what extent do you agree with the introduction of a meanwhile uses policy?**

- a. Agree
- b. Partially agree

- c. Neutral
- d. Partially disagree
- e. Disagree

**Please provide any further comments or reasoning**

Use of premises for suitable 'pop up' uses can stop the area looking neglected and encourage visitors. Such uses should be encouraged.

## **Chapter 8. Brownfield Land**

### **Question 29: How else can we encourage development on brownfield land, whilst also planning positively to meet our needs for homes and employment land?**

Dorset CPRE strongly supports an **urban brownfield-first approach** to meeting housing and employment needs. The suggested 2500 homes on brownfield in the site consultation is we believe **extremely modest** for the **whole** of Dorset and calls into question the accuracy of the brownfield register. Prioritising previously developed land is essential to protect Dorset's countryside, National Landscapes, Green Belt, and high-quality farmland while revitalising under-used sites in towns and larger villages.

#### **1. Brownfield First Policy**

The Local Plan should make clear that **urban brownfield land must be fully utilised before greenfield sites are considered**. This aligns with national policy, reduces pressure on valued landscapes, and promotes sustainable regeneration of urban areas. The policy should require robust demonstration that brownfield opportunities have been exhausted before greenfield allocations are released.

#### **2. Brownfield Register and Monitoring**

We recommend Dorset Council maintains and updates a **comprehensive Brownfield Register** with transparent monitoring of progress in delivery. Annual reporting should demonstrate how much housing and employment space has been delivered on brownfield land versus greenfield, to ensure policy is working in practice.

#### **3. Incentives and Viability**

Some brownfield sites are complex or costly to redevelop due to contamination or infrastructure constraints. Dorset Council should:

- Work with Homes England and government to secure funding support.
- Explore reduced planning obligations or targeted infrastructure investment where it enables regeneration of priority brownfield sites.
- Prioritise brownfield in town centres and areas with sustainable transport links.

#### **4. Housing and Mixed Use**

Brownfield redevelopment provides an opportunity to deliver **sustainable housing in accessible locations**. We encourage policies that support **mixed-use schemes** (housing, employment, and community uses) to bring vitality and services back into town centres and reduce the need for greenfield expansion.

#### **5. Climate and Design Standards**

All brownfield development must still achieve the **highest environmental standards**. Policies should require net zero ready homes and buildings, sustainable drainage, and biodiversity

net gain. Brownfield sites should not be treated as an excuse for lower quality design or environmental performance.

**6. Safeguards for Biodiversity**

Not all brownfield sites are low-value. Some provide important **urban habitats for wildlife**. The policy should require ecological assessment of brownfield land and ensure biodiversity net gain is delivered on or off-site.

**Conclusion**

Dorset CPRE urges Dorset Council to embed a **robust urban brownfield-first policy** as a cornerstone of the Local Plan. Brownfield development, done well, can meet housing needs, regenerate town centres, and protect Dorset's countryside — but only if it is prioritised ahead of greenfield and held to the same high sustainability standards.

**Chapter 9: Green Belt Review**

**Question 30: To what extent do you agree with taking land out of the Green Belt to help meet our development needs?**

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. **Disagree**

**Please provide further comments or reasoning**

Dorset CPRE does not support Dorset Council's proposed release of land from the South East Green Belt. We do not agree that the Government's excessive housing targets represent an exceptional circumstance that justify a review of the Green Belt boundaries.

Retaining the integrity of the South East Dorset Green Belt, which surrounds Bournemouth, Christchurch and Poole is vital not only for preventing the continuing sprawl of the conurbation, but also for ensuring that historic towns and villages retain their setting and special character and do not merge. Significant levels of development are proposed in Annex A for the settlements of Corfe Mullen, Longham, Lytchett Minster, Lytchett Matravers, Ferndown and West Parley, Sturminster Marshall, Wareham, Wimborne Minster and Colehill which, if all or even a significant proportion were allocated, would have a hugely detrimental impact on the Green Belt. There are significant numbers of Brownfield Sites within the BCP conurbation, for example the site of the former Poole Power Station, which could meet demand for housing in the area. In our opinion there should be no release of land from the Green Belt whilst previously developed land capable of re-development lies 'empty'.

The South East Dorset Green Belt is unique in that it includes internationally important heathlands. Increasing the population size in the Green Belt would put additional pressure on this sensitive habitat, which mitigation measures (Heathland Infrastructure Projects /SANGs) do not remove.

In addition to fulfilling its planning purposes the Green Belt also provides a range of additional important roles, it is essential to helping Dorset meet its climate and ecological commitments, providing natural capital, farmland, and space for biodiversity recovery.

## **Chapter 10. Self-build and custom-build housing**

**Question 31: We have suggested that the Local Plan should include a flexible settlements policy which would allow new homes around certain towns and villages. What impact, if any, do you think the proposed flexible settlements policy might have on opportunities for self-build homes?**

- a. High Impact
- b. Some Impact
- c. **No Impact**

**Please provide further comments or reasoning.**

Dorset CPRE does not support the introduction of the Flexible Settlements policy. You can still have a settlement boundary and indicate that self-build for local people might be a reason for an exception site, and be linked for example, with a Community Land Trust proposal.

**Question 32: Is there anything else we should do to increase the supply of self-build plots?**

All sites should include a fixed allocation on all sites of land set aside for self-build and also Community Land Trust use, thus enabling local people to build or rent on that development.

## **Chapter 11: Neighbourhood Plans**

**Question 33. We have suggested that housing requirements for neighbourhood plan areas should be finalised at the next stage of preparing the Local Plan. This is likely to involve consideration of sites with planning permission, local plan allocations and unplanned development. To what extent do you agree or disagree with the proposed approach.**

- a. **Agree**
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

**Please provide any further comments or reasoning....**

As the Neighbourhood Plan has to fit with the Local Plan this is a logical approach. However, as clearly some of the proposed site allocations where Neighbourhood Plans (NPs) already exist have completely ignored the preferences in the Neighbourhood Plan, we recommend that each Neighbourhood Plan is closely examined against the proposed sites to ensure that extant NPs aren't seen to be completely irrelevant. Neighbourhood Plans take a long while to develop and do represent the views of the local community and stakeholders. They shouldn't just be seen as something to be changed in response to the completely absurd and unrealistic targets derived from the Standard Method. Indeed Neighbourhood Plans may well provide strong evidence and arguments, relating to landscape, biodiversity, heritage and other constraints that can help Dorset Council to resist the Standard Method targets.

**Question 34. Should the housing requirement figures for neighbourhood plan areas outside the Green Belt, include an allowance for sites that could come forward through the flexible settlements policy**

- a. Yes
- b. No**

**Please provide any further comments or reasoning.**

We disagree with the flexible settlement policy. The settlement boundaries should be set by the LP in the villages probably as they are now. Anything outside the boundaries can then have an exceptions policy that clearly identifies the type of scheme that can take place outside it. e.g. this is very good in the adopted West Dorset/ Weymouth and Portland LP. Such policy should then be defended rigorously.

#### **Chapter 12: Sites for Gypsies, Travellers and Travelling Show people**

**Question 35: We have suggested that our Local Plan objectives for Travellers should be**

- to reduce the numbers of unauthorised sites
- to provide opportunities for sites to expand
- to encourage new Traveller sites in sustainable locations, and
- to provide opportunities for Travellers to deliver their own sites

**Do you have any comments on the objectives for meeting the need for Traveller sites?**

Dorset CPRE supports the Dorset Council in its objective to reduce the numbers of unauthorised sites. Where expansion of existing sites is proposed this should be subject to consideration of the impact on the landscape and environment. We do not support expansion, or provision of new sites in the National Landscapes or Green Belt. New Sites for Gypsies, Travellers and Travelling Show people should be provided within the settlement boundaries of towns/villages, with a focus on delivering sites on previously developed land where suitable.

**Question 36: To help ensure that enough pitches are provided to meet Dorset's needs, Traveller pitches could be delivered alongside homes for the settled community on large scale residential development. Are there any issues which you think we need to consider in locating Traveller pitches alongside new built homes for the settled community?**

In delivering Traveller pitches alongside homes for the settled community it is essential that this is carried out in consultation with both communities. Pitches should be situated within the development in such a way as to avoid discrimination and designed to meet the needs of the travelling community.

**Question 37: We are suggesting that 5 Traveller pitches should be provided for every 500 homes on large development sites. Is this threshold correct?**

- a. Yes**
- b. No-it should be higher
- c. No- it should be lower

**Please provide any further comments or reasoning here:**

No further comments

**Question 38: To encourage Travellers to deliver their own sites, we are suggesting that the Local Plan should include a criteria policy which takes account of the site's location, access, neighbouring development, environmental impact and management of the site. Do you think we need to add or change any of the suggested criteria?**

Dorset CPRE supports the inclusion of a criteria policy that enable proper assessment of Travellers sites, impact on the landscape and agricultural land value should also be considerations when assessing site suitability.

### **Chapter 13: Strategic Heathland Recreation Mitigation**

**Question 39: We have identified opportunity sites which could deliver more homes to help meet Dorset's housing needs. Do we need to change the approach to mitigating impacts on protected Dorset Heaths habitat sites as part of planning to meet increased housing needs?**

- a. **Yes**
- b. No

**Please provide further comments or reasoning.**

Dorset CPRE considers that Dorset heaths are **internationally important habitats** that must receive maximum protection. The LP does not permit most types of residential development within 400m of a heathland site. For residential development beyond 400m but within 5km of heathland, mitigation is required to avoid potential harm to the habitat.

#### **1. Risks to Heathland**

Dorset CPRE is concerned that many of the larger development sites are within 5km of major heathland sites of Holt Heath, Upton, and Holton Heaths.

The plan only identifies the risks caused by human and pet disturbance. This ignores the risk of fires and especially those caused by arson or BBQs, which is a regular occurrence resulting in extensive damage on heaths adjacent to housing (e.g. Canford Heath, Upton Heath, Stoborough Heath). Further housing developments nearby increase the risk of fire through arson and of fire spreading to residential areas, posing dangers to people, property and wildlife.

#### **2. Heathland Mitigation**

The proposal to reduce human disturbance relies on mitigation through the use of Heathland Infrastructure Projects and SANGs. Only a small number of very small HIP sites are suggested in the plan and given the size of the developments these would be unlikely to be sufficient to satisfy the demand for open accessible space. Notably developments in Lytchett Matravers and Minster, Colehill, West Parley and Wareham. The report by Footprint Ecology (Panter et al. 2021) concluded that “there is insufficient evidence to suggest that the increase in vehicle counts or other measures of visitor use on the heaths, relative to the increase in nearby housing at SSSIs decreases with the total number or area of nearby SANGS and large HIPs.” This questions the effectiveness of HIPs. HIPs/SANGS may be more effective if located within walking distance of major developments or where there are multiple small-scale developments around villages. They also need to be larger and better connected according to Panter et al (2021). The report, however, did not find a relationship between housing growth and change in housing growth. However, the Panter et al report was based upon an increase in housing of 3x more in 2021-2038 compared to 2007-2021. **This was before the government drastically increased housing targets so consequently the report’s findings and recommendations may underestimate the risk to heathland.**

In conclusion we support the policy of excluding residential development within 400 ms of heathland. However, given the problems facing heathland from the levels of growth already taking place and already planned, we do not feel that the Heathland Mitigation Strategy (HMS), certainly as being inadequately applied, is capable of deflecting the problems which will arise from the increased levels being proposed in this Plan. The HMS needs to be more strictly applied and the growth levels need to be hugely reduced."

**Question 40: To what extent do you agree or disagree with development at Shapwick to enable the delivery of public benefits from investment in the Kingston Lacey Estate?**

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. **Disagree**

**Please provide any further comments or reasoning.**

In principle Dorset CPRE does not support development of Shapwick village by the National Trust. The majority of the village is designated as a conservation area and is situated close to the National Landscape. Development within the village would not be in keeping with its historic nature. Currently there is adequate public access to the Kingston Lacey Estate, and it is not felt that it is necessary to create a SANG on the estate.

#### **Chapter 14. Onshore Wind, Solar, and Battery Energy Storage**

**Question 41: We have outlined some areas which could be appropriate for wind turbines, ground mounted solar panels and battery energy storage. To what extent do you agree or disagree with identifying broad areas of opportunity for wind, solar and battery energy storage?**

- a. Agree
- b. **Partially agree**
- c. Neutral
- d. Partially disagree
- e. Disagree

1. We agree in principle that identification of appropriate areas is important. However, as you know, the data in Tables 4.2 and 4.3 do not by take into account landscape sensitivity and therefore represent an optimistic measure of the magnitude of appropriateness. We understand that when the Council's Landscape Sensitivity Assessment is available it will be possible to reveal a more realistic assessment through an overlay process. However, we welcome the decision that the whole Local Plan area has been assessed in the supporting technical work as being of high landscape sensitivity to (1) the proposed largest scales of wind turbines (maximum heights between 151 m and 220 m) and (2) ground-mounted solar panels (development areas between 21 ha and 120 ha). Consequently we understand that these very largest options have not been included in the Consultation although they will be subject to a Sustainability Appraisal.
2. It can be emphasised here that Dorset CPRE has enthusiastically supported community renewable energy projects of all types and roof-deployment of solar photovoltaics of all types for many years and it will continue to do so.

It can be noted that when compared with roof-mounted solar photovoltaics, large stand-alone ground-mounted solar photovoltaic installations:

1. Can give rise to higher transmission losses.
  2. Take-up more of the diminishing available capacity on local and distribution networks.
  3. Do not allow or are not conducive to wilding, tree growing or agricultural practices.
  4. Are more damaging to Dorset's highly valued landscape, heritage, farming and amenity assets.
  5. Are less financially beneficial to local residents, businesses and communities that invest in their own installations.
3. LUC acknowledges that it has a limited view when it suggests that ground-mounted solar photovoltaic has the largest technical energy output in Dorset (Dorset Renewable Energy Assessment, para. 4.67, p.55, LUC September 2025). We would like to question this.
4. A high estimate for Dorset's electricity consumption in 2050 is 3,940 GWh of which 470 GWh is estimated to have been generated from operational renewable energy sources in Dorset in 2024.
5. For the balance of 3,470 GWh<sup>4</sup> to be satisfied by ground-mounted solar photovoltaics would require **6,779 ha** of development land, equivalent to 10,592 standard 100 m x 64 m adult FA football pitches<sup>1</sup>. **The resulting damage caused to Dorset's outstanding landscapes and farmland by this deployment would be disastrous.** It can be noted that at 31 December 2024, 48 ground-mounted solar photovoltaic installations in Dorset with planning consent have a total development site area of 1,217 ha, this is equivalent to 1,963 football pitches. What is being considered for the future, 10,592, is more than 5 times greater than this.
6. As a more acceptable alternative, it can be claimed that the balance of 3,470 GWh could be supplied by a single Rolls Royce Small Modular Reactor (SMR) occupying a **2.15 ha** development site at Winfrith Innovation Park. This has the potential to generate an annual 3,911 GWh of low carbon electricity<sup>2</sup>. **This would cause minimal damage compared with deployment of ground-mounted solar photovoltaics.**
7. A second more acceptable alternative is annual generation of, up to, 5,057 GWh of renewable electricity from 1.65 GW of installed capacity (IC) anticipated for the proposed PortWind offshore wind project. This is planned to be located outside Lyme Bay, in the English Channel, 22 km (14 miles) off the coast at Weymouth<sup>3</sup>. **Again, this would cause minimal damage compared with deployment of ground-mounted solar photovoltaics.**

**Ref.1.** The assumptions for this are to deploy, as an illustration, 13.2 million Sanyo HIT- 250E01 solar photovoltaic panels, with an installed capacity (IC) of 250 W, dimensions 1.610 m x 0.861 m (an output of 180.3 Wm<sup>-2</sup> ) and a load factor (LF) of 12%. The average area occupied by solar photovoltaic panels within 48 ground-mounted solar photovoltaic development sites in Dorset is 27%. This has been taken into account to arrive at the total development site area of 6,779 ha, as reported above at para.5.

**Ref.2.** Rolls Royce claims its SMR has an installed capacity (IC) of 470 MW, a load factor (LF) of 95%, a development site area of 2.15 ha (5.3 acres) and a working lifetime of 60 years. Rolls Royce expects its first SMR unit to be operational and generating power for the grid in the mid-2030s.



**Ref.3.** Developer Source Galileo has secured a 2.5 GW National Grid connection to the Chickerell 400 kV substation, near Weymouth. 1.65 GW of this is reserved for the PortWind offshore wind project. An IC of 1.65 GW has the potential to generate an annual 5,057 GWh with a load factor of 35%. A Memorandum of Understanding (MOU) to jointly progress the project was signed by Source Galileo and Portland Port on 10 February 2025. The project is in the early stages of development and turbine details remain to be decided. The Rampion 2 offshore wind project in the English Channel that is being managed in Newhaven at East Quay, received planning consent on 4 April 2025. Maximum height 325 m turbines with an IC of 13.3 MW were chosen for this project. As an illustration, if the same turbine was chosen for the PortWind project, it would require 124 x 13.3 MW IC turbines to have an IC of 1.65 GW. Source Galileo expects the wind farm to be operational in 2036.

Ref.4. Dorset Renewable Energy Assessment, Table 4.3, p.53, September 2025, LUC. 3,470 GWh is 3.8% of Dorset's total technical resource of ground-mounter solar photovoltaics.

### **Data Sources**

1. Large-scale electricity storage, The Royal Society, 8 September 2023.
2. Digest of UK Energy Statistics (DUKES), 31 July 2025, Department of Energy Security and Net Zero (DESNZ).
3. Solar Photovoltaics Deployment, 25 September 2025, DESNZ.
4. Quarterly FIT Installations Report (for installations below 5 MW), 6 June 2025, DESNZ.
5. DUKES, Table 6.3 (Load Factors), 31 July 2025, DESNZ.
6. Subnational Electricity Consumption Great Britain 2003-2023 and Northern Ireland 2015-2023, 19 December 2024, DESNZ.
7. Renewable Energy by Local Authority 2011-2023, 31 October 2024, DESNZ.
8. Energy Trends, Table 5b, 26 June 2025, DESNZ.
9. Energy Trends, Table 6.1, 26 June 2025, DESNZ.
10. Renewable Energy Planning Database (REPD) Quarterly Extract, 20 August 2025, DESNZ.
11. Dorset Council Planning Application Database.

## **Chapter 15: North of Dorchester Masterplan**

### **History**

- The North Dorchester Development has been proposed in various forms for several decades. Poundbury was favoured over North Dorchester in 1987.
- The site was reinvestigated by the West Dorset District Council. However, a report in 2018 by Halcrow identified several key constraints including the limited capacity road networks, the inadequacy of electrical distribution, limited water supply and sewage treatment and limitations posed by the sensitive built and natural environment.
- The current development was proposed in 2019 following the formation on the unitary Dorset Council and appeared in the draft Local Plan in 2021. Dorchester Town Council consistently raised concerns about the deliverability of the proposed development and pointed out that the scale of the project would not be able to fund the necessary infrastructure. Critics argue that the project is not viable if it cannot fund key community infrastructure.
- In 2021, the site was successfully included in the Government's Garden Community Programme and received some funding for a viability study by Hyas and, later, an outline masterplan. However, the future of the UK garden communities programme is uncertain under the new government where the focus has shifted toward building "New Towns" on brownfield sites, potentially leaving many existing garden community projects without the strong central backing they require.

- In 2025. The viability of the site remains a major concern. The viability assessment by Hyas for Dorset Council in 2023 has still not been released despite three Freedom of Information (Fol) requests by STAND and the Dorchester Civic Society.

### **General**

- The masterplan prepared by Hyas for Dorset Council for the North Dorchester Development is in the main report of the draft local plan. See the [web site](#) and [masterplan document](#).
- Interestingly this is significantly different from the masterplan advertised by the main developer: Grainger which is shown in the Dorchester map in the sites [appendix A](#). For more details of the developers plans see [here](#) and [here](#).
- Grainger's plan is "ownership led" as it excludes land from three land owners in the North. Dorset Councils Plan (prepared by Hyas) is "Landscape led" and is, frankly, a better plan.
- A third masterplan has been proposed by Turner Associates (the land agent for Kirby's and Barber's land) which would also be "landscape led" but take into account more local wishes – like retention of the showground.
- Grangers say they will seek planning permission as soon as possible (Oct/Nov). It will be for 3750 homes and they expect Kirby's and Barber's land to be added afterwards which would bring the total number of houses to more than 4000.
- There is a risk that this number would increase further as housing creeps ever furth North along the A35 and towards the Piddle Valley.
- All local organisations: Dorchester, Stinsford and Charminster councils, STAND, Hardy Society, Dorchester Civic Society, Dorchester Transport Action Group etc. are against the development. This is because there is very little in this development which will be beneficial for the rest of Dorchester. Some of these organisations now believe the development cannot be stopped and so are moving reluctantly toward a position where they will try to influence the best possible development they can get. However, there is great scepticism that they have the power to influence the development in any meaningful way especially given the support of Dorset Council. Lack of local democracy makes local people very angry and dismissive of the system which leads to further political problems down the line.

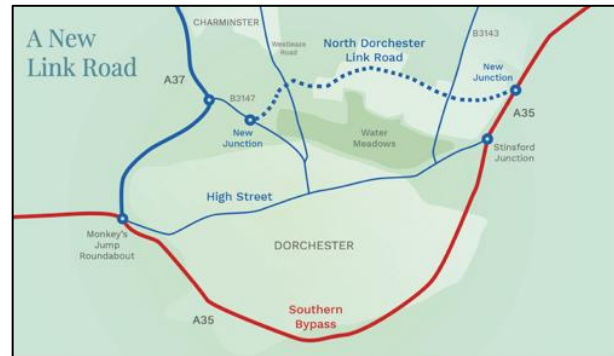
### **Employment**

- Employment is a driver for this level of new housing in Dorchester and surrounding areas. This is because (i) Dorchester has twice as many jobs than people to fill them and so acts as a commuter centre – however this is not an unusual situation for towns and cities. (ii) Dorset expects big growth along the Portland-Weymouth-Dorchester-Wool-Wareham axis due to new jobs in clean energy (offshore wind, hydrogen storage, nuclear power, advanced technologies and Carbon Capture and Storage). However, many of these jobs are speculative and will employ only a small number of professionals in primary jobs who will generally come from outside.
- It is difficult for the North Dorchester development to satisfy both of these criteria. Does it build homes for the people commuting in from outside or does it create new jobs for the people living in the North Dorchester Area? It can't do both.

### **Access and Transport**

- According to Graingers, Phase 1 is the Eastern section. Access would be along Slyers Lane from the B3150 into Dorchester (not from the A35). This road is far too small and would clog up the access to Dorchester.

- All masterplans, currently include a new link road, connecting the A35 and the A37. However, this would bring substantial quantities of heavy traffic through the garden community (which seems contrary to its purpose).



- Two new junctions would be required with the western one across the water meadows. They would be very expensive almost certainly requiring funding from the Department of Transport. This could affect the viability of the development and impact the viability of affordable housing, land set aside for services (e.g. schools, recreation etc.) and net zero targets.
- Graingers claim “previous studies have shown that providing a link road will . . . help reduce traffic on the southern bypass, as well as through the centre of Dorchester.” It is much more likely that, with an extra 10,000 people living in North Dorchester, it will just increase traffic on all these roads.
- This new development, if it goes ahead, should be designed from the bottom up with Active Travel and Public transport at its heart. This means parking places are restricted and controlled, private cars are discouraged around the residential areas, there is a network of green (active travel only) routes connecting all areas and connecting the development to Dorchester in several places. A good model would be Houten near Utrecht in Holland.

### Climate Change

- This new development, if it goes ahead, should be built to net zero standards – 100% renewable energy, low embedded carbon, electrical heating etc. Given current constraints to the national grid, it would also be a good candidate for a private microgrid with renewable energy from PV solar (rooftops and community solar array) supplemented with some onshore wind and battery energy storage (BESS). This would bring forward connection dates and make the renewable energy infrastructure more attractive commercially. The national grid would then only be required as a backup.

### Dorset Local Plan Sites Consultation

- The Dorset Local Plan consultation asks 4 specific questions of the North Dorchester Development. All are peripheral to the real issues and do not get to the key questions about viability, sustainability and impact on the local community. It is suggested these questions are answered in the following way:

**Q42. Since Roman times, the centre of Dorchester has had a prominent position in the landscape. One of the treats to this identity is at the eastern edge of the potential development area (near the A35). Would you support keeping the Eastern area more green and open or allowing limited development with careful landscape design?**

- Agree**
- Partially Agree**
- Disagree**

- d. Partially Disagree
- e. Neutral

**Please provide comments or reasoning .**

The greener the edge the more it blends into the existing landscape and makes more space for nature.

**Q43. Supporting jobs, homes and services all in one place is an essential part of the health of a town. Do you see new workspaces that are integrated into the walkable neighbourhoods and local centres as an attractive part of Dorchester in the Future?**

- a. **Agree**
- b. Partially Agree
- c. Disagree
- d. Partially Disagree
- e. Neutral

**Please provide comments or reasoning**

Better that new workspaces for offices and small businesses are integrated into the communities. This is not a good site for larger industries or storage/distribution companies because of the lack of rail and poor road connectivity.

**Q44. We believe that the valley at Pigeon House Farm can play an important role in encouraging access to nature and celebrating local landscape. What type of development, if any, do you think could help support <the valley at Pidgeon house Farm> in a sustainable way?**

- i. A smaller scale of development
- ii. A larger scale of development
- iii. **The use of the area as an undeveloped landscape buffer, for recreation, education, and nature interpretation, without any housing development.**
- iv. A mixture of the above.

**Please provide comments or reasoning.**

The use of the area as an undeveloped landscape buffer for recreation, education and nature interpretation without any housing development. Any housing development would lead to overdevelopment of this rural area with steep slopes. A generous buffer to the North is required to prevent skyline development and provide a green “wheel” around the site.

**Q45. What are your priorities for a new east-west route.**

Any East-West route would end up as a rat run attracting through traffic in the centre of the garden community blighting it with heavy traffic and undermining its credentials. Instead, the development should be planned with active travel and public transport at its heart – consistent with the vision in Dorset’s Local Transport Plan.