



The countryside charity
Dorset

Dorset CPRE

7th November 2025

Cllr Shane Bartlett
Member for Planning and Emergency Planning
Dorset Council

Dear Shane,

Conflict between recent ONS Dorset Housing Growth and NPPF Housing Need Guidance

We are writing to express Dorset CPRE's concern that Dorset Council's emerging Local Plan may be rendered unsound if it continues to adopt the Government's **Standard Method** figure of **3,246 homes per annum (55,182 homes over 17 years)**.

The **latest ONS 2022-based household projections**, published on **28th October 2025**, indicate that Dorset's true household growth will be **between 1,700 and 2,000 per annum**, depending on migration assumptions. This stark difference exposes a **fundamental conflict within the National Planning Policy Framework (NPPF)** itself:

- **Paragraph 62** of the NPPF instructs councils to use the Government's *Standard Method* to calculate housing need; yet
- **Paragraph 36(c)** requires plans to be *effective* — that is, *deliverable over the plan period*.

For Dorset, these two tests cannot both be satisfied. A plan based on 3,246 homes per year would **not be deliverable and therefore could not be considered sound**.

1. The Evidence from ONS

The ONS projections, which incorporate the latest population and migration data, show that:

- Under the **recommended migration category variant**, Dorset will see growth of **29,430 households (≈1,730 p.a.)** between 2026 and 2043.
- Even under a **high migration** scenario, growth rises only to **35,349 households (≈2,080 p.a.)**.
- The Standard Method requirement of 55,182 homes is therefore **at least 20,000 dwellings higher** than any credible demographic projection.

Moreover, **88% of projected growth** comes from households headed by people **aged 70 and over**, and almost all the increase is in one- and two-person homes — reflecting reduced household size, as well as population expansion.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

2. Dorset's Physical and Infrastructure Constraints

Even if demand were sufficient, Dorset faces severe environmental and infrastructural limitations:

- **Over 40% of the county** lies within **National Landscapes (formerly AONBs)**, protected for their scenic and ecological value.
- The county has a **dispersed rural settlement pattern**, limited public transport, and a road network already at or beyond capacity in many areas.
- Utilities and public services (sewerage, GP capacity, water supply, schools) are constrained and cannot easily accommodate large-scale dispersed growth particularly re health care for population growth in people over 70 years.

These constraints further limit the realistic scale and location of deliverable housing sites. A strategy predicated on 3,246 dwellings per annum would therefore require developments in unsustainable locations, contrary to the NPPF's own environmental and infrastructure principles.

3. Market Realities

Developers only **build to demand, not targets**. Dorset already has **more than 10,000 permissioned plots** that remain undeveloped. Increasing allocations or permissions will not result in faster build-out; it will simply lengthen developer control of supply.

Demand for housing is not governed by theoretical, over-simplified formulae which purport to reflect "need" or "affordability". Even if local incomes were to rise substantially or major subsidies were introduced, the household market cannot absorb the level of construction implied by the Standard Method.

4. The Consequences of Adopting the Standard Method

Proceeding with an undeliverable target exposes the Local Plan to **two levels of failure**:

1. **At Examination:** the Plan risks rejection by the Planning Inspector as **unsound**, since its housing strategy would fail the NPPF test of deliverability (para. 36).
2. **In Practice:** if adopted, the Plan would inevitably **fail to meet its own delivery targets**, fuelling speculative development and undermining confidence in the planning system.

5. A Realistic and Defensible Approach

Dorset CPRE therefore urges the Council to:

- Base its housing requirement on the ONS 2022-based projections, particularly the migration category variant, **implying around 1700 or so dwellings per annum**;
- Demonstrate that this level is both **deliverable** and potentially **compatible** with Dorset's landscape and infrastructure capacity;
- Highlight the inherent **policy conflict within the NPPF** as part of its evidence to Government and the Planning Inspectorate and
- Ensure that the terms of reference for the forthcoming Housing Needs Assessment make full reference to ONS 2022-based projections and the local need for truly affordable social rent housing.

Such an approach would be **consistent with the evidence, faithful to NPPF soundness tests, and sustainable in Dorset's environmental context**.

Yours sincerely,

Jez Hughes
Acting Chair of Trustees