

Dorset Climate Action Network (DCAN)

Advice on responding to the Dorset Local Plan

Introduction

We hope that anyone reading this will respond to Dorset's consultation on the Local Plan as an individual. Please do not be put off by the size of the Plan (over 600 pages) or the clunkiness of the consultation process. This plan is very important as it provides a framework for all Dorset's ambitions from 2025 to 2038 and will directly impact the lives of everyone in the county. There are some big and important issues at stake including cutting greenhouse gas emissions, slowing down the pace of climate change, reverse the loss of wildlife and promoting the well-being and resilience of the County's environment, economy and communities.

Your individual response is important and will be listened to by the county planners and any inspectors especially if it is clear, respectful and we are all broadly pointing in the same direction.

In Section 1, this document contains some advice on the consultation process and, in Section 2, we have some comments on the Local Plan which you are welcome to use if you wish. DCAN is also preparing a more detailed response which will be sent on behalf of the whole DCAN group.

Remember this is your opportunity to comment on the plan and you should not feel in any way constrained by what you say.

Section 1 Guidance on the process

The Plan

You can access the Plan at <http://www.dorsetcouncil.gov.uk/Dorset-council-local-plan> .

Click on the orange 'Comment on the Dorset Council Local Plan' button. Then scroll down and click on 'View' if you just want to read some of it. If you want to comment on the Plan as well, click on 'View and Comment'.

Volume 1, covers 6 different topics, Sections 1-6 in the Plan. Policies numbers in a Section are prefixed with the letters in brackets.

1. **Introduction:** brief introduction highlighting the main issues and challenges.
2. **Development Strategy (DEV):** a vision for the development of the county setting out its target for over 30,000 new homes to be built by 2038, and the jobs that will be needed. Policies are prefixed DEV.
3. **Environment (ENV):** managing the impact of this development on Dorset's environment, covering biodiversity, pollution, flooding, coastal erosion, landscape, and heritage.
4. **Housing (HOUS):** policies setting out the mix of homes on development sites including the size and type of homes (including affordable homes) and the delivery of care facilities.
5. **Economy (ECON):** the approach to development of employment sites, managing town centre development, and developments for tourism sector and agriculture.
6. **Community Infrastructure (COM):** approach to education, transport, recreation, sports, community facilities, telecoms infrastructure and renewable energy.

Volume 2, Sections 7- 37 covers the 4 different '**Strategic/Functional Areas**' of Dorset, and the planned development within them. After the Introduction to each Area, there follows more detailed information about developments in the towns and villages (27 in total). Our Guidance here is focussed on the '**Topics**' in volume 1 of the Plan, which cover the policies for the whole Dorset Council area.

Responding to the Local Plan

We advise that, before responding, you read the Plan, or at least the part of it that most affects you. There are four ways you can respond to the Plan:

1. Fill out the online form (see link above). This is Dorset Council's preferred method but the form is long and cumbersome and there is no option to save as you go.
2. Use the downloadable PDF document, which is accessible from the link above. Scroll down past the links to all the documents and click on 'response form.'
3. **Open the attached WORD document, 'DC Response document WORD version v2', which has the same layout as the PDF form above but is easier to use. Fill it out, save it with your own name and email it to planningpolicy@dorsetcouncil.gov.uk**
4. Send in a hand-completed form to DCC or just write them a letter of comment or objection. The address is: Planning Policy Team, Dorset Council, South Walks House, South Walks Road, Dorchester DT11VZ

Our advice is to use the attached WORD document and submit it by email when you are ready. The WORD form has 6 Parts:

- A. Information about you and any organization you represent (if any).
- B. General Questions on specific paragraphs, policies, sections or chapters of the Plan. This is where you would comment on the 'Topics' part of the Plan
- C. Comments on development in particular sites. . This is where you comment on developments in specific areas and locations that you care about.
- D. Comments on Areas where there are different options for growth; A, Gillingham & Wool.
- E. Specific discussion points relating to strategy and vision, transport, renewable energy (wind, solar), climate change, neighbourhood plans, various housing types, healthcare, economy and a host of other things.
- Section called 'About You' with further details about yourself like gender, age, ethnicity.

For a quick response, you must fill out the * fields in Part A for the response to be valid and then put your short general comments in Part B.

For a fuller response, we suggest you fill out Parts A and the last part, 'About You'. Then type all the comments you wish to make about general Topics in the in Part B. Each comment should be separated and preceded by a reference. The box extends to a new page if necessary.

Any comments you have about particular locations or areas go in part C, but this isn't covered in our comments below.

Whichever method you use, ensure that it has your name and address with postcode and that your response reaches the planning team by the deadline of **Monday 15 March**

In your response we urge you to be positive and, if you disagree with the draft Plan, to offer alternatives. It is also good to consider the whole county picture and not just your local area. Remember, there is little chance of delaying this Local Plan which now has to be completed by 2023, so our best hope is to improving it and make it the best plan possible.

What is DCAN ?

The Dorset Climate Action Group (DCAN) a non-political organisation which has been set up in response to the growing public concern about the impact of climate change, the use of the world's resources, the loss of wildlife and related threats to social justice. The network aims to stimulate awareness of these issues and support local action throughout Dorset.

What Does DCAN think ?

Here's a list of DCAN's '**Top Ten**' most important comments on the Plan. They are shown in bold in Section 2 of this document:

- The Plan needs a coherent, optimistic and inspirational vision of where Dorset should be by 2038 which is the end of the Plan period.
- The Plan's housing requirement should be based on local housing need, not national targets.
- There should be less emphasis on big new housing estates, and more on use of brownfield sites and on small developments in villages to meet local need.
- The Plan should insist on highest standards of quality, sustainability and energy-efficiency in the design of all new buildings.
- The Climate and Ecological emergency (which is recognised by Dorset Council) should underpin every policy in the plan.
- This means the Plan needs to be based on a strategy or roadmap to achieve net zero greenhouse gas emissions by 2050, as required by Section 1 of the Climate Change Act 2008, as amended in 2019, and include intermediate targets of a 50% and 75% reduction by 2030 and 2040 respectively.
- The Plan needs a pathway for the rural economy with new workspace being built in many towns in the County and capitalising on opportunities for jobs in the "Green Economy".
- The Plan needs an integrated transport plan to link all Dorset communities, avoid unnecessary private car journeys, promote public transport and encourage walking and cycling.
- Sites for Nature Recovery and the existing and potential Ecological Networks should be allocated at the same priority as land allocated for housing and jobs.
- Within sensitive and protected areas (including the AONB), developers should not be allowed to mitigate any loss of habitat by paying compensation, as this very rarely results in equivalent habitat being replaced.

DCAN thinks that there are serious deficiencies in the draft Local Plan and that it needs a fundamental rewrite to make it based on, and compatible with, the Climate and Ecological Emergency. Dorset Council intends to supply land sufficient for 39,285 houses but we believe this number is far in excess of actual need and that the council has the power and authority to set a much lower number. We believe there should be many more truly affordable houses and that some of the houses should be reallocated to outlying villages to support their long-term future. All new houses should be built with a zero-carbon footprint and with the highest material standards so that later retrofitting is not required. We think there needs to be a county-wide transport policy that connects the county without increasing private transport. We think that consultation on this plan should be much more extensive and much more locally based with strong neighbourhood plans and an overall Plan for larger towns. We want the Local Plan to be much more ambitious and forward looking so that we can build a strong local economy, green tourism, ecological regeneration and much, much more

Our offer to Dorset Council is to work with them to develop such a plan within the timeframe set by the government. We would also like to see action to cut emissions and tackle the Ecological Emergency to start immediately.

Section 2 Comments

This section lists specific comments on parts of the Local Plan with our 'Top Ten' repeated in Bold. Most comments are preceded by their reference to a particular policy, section or paragraph number in the Local Plan. This is to help you find and read the part of the Plan that mentions the subject and also, importantly, so that you can state this reference at the beginning of any comment you want to write to Dorset Council. The Council have told us that it is **essential** to give a reference so they know which part of the Plan is being commented on.

Some comments do not have a reference. They are ones that are our own or external agencies' views and you may wish to use them when commenting on a particular, referenced part of the Plan. Please feel free to use any of these comment as they have been written, to modify them according to your taste or to write your own comments in from scratch.

The comments are grouped thematically, so you can go straight to the subject that you're interested in, without getting bogged down in the complete Plan.

The themes are: 1. Housing Numbers, 2. Housing Issues, 3. The Environment and Climate Change, 4. Transport, and 5. Renewable Energy.

1. Housing Numbers

1.1 An overestimate of Dorset's projected housing need?

(Para 2.2.1) & (DEV1) The number of new homes given in the Plan appears to be in excess of Dorset's local housing need up to 2038. It has been calculated using the government's Standard Method for assessing housing growth and seems to have been accepted without challenge by Dorset Council.

(DEV1) The Plan's housing requirement must be based on local housing need, not national targets

(DEV1) The Dorset Campaign for the Protection of Rural England (CPRE's) independent 2020 report, says that out-of-date population and household projections were used in the Standard Method calculation for Dorset, resulting in a large overestimate of housing need.

(DEV1) Dorset CPRE says that inflated rates of net migration and other factors were used in the calculation and this will lead to unaffordable housing for local people.

1.2 Justification for a reduction in numbers

(DEV5) The Plan doesn't mention the option offered by the National Planning Policy Framework (Paragraph 60 of NPPF) that a planning authority may in '**exceptional circumstances**' use a different method of calculating the level of housing growth. Dorset should use this provision to obtain a better estimate of housing need. Dorset's '**exceptional circumstances**' justifying a different basis of calculation would include:

- Its rich heritage of landscape, natural habitats, wildlife, geological features, historic towns and ancient monuments,
- A wide range of global, European, national and local designations which protect our heritage,
- The Green Belt, providing a 'green lung' for the people of South East Dorset and the Bournemouth, Christchurch and Poole conurbation,
- Traffic congestion in Central and South East Dorset, and other severe pressures on the infrastructure.

(Para 2.2.7) In the Plan the council has included extra land to meet *more* than the calculated requirement), some of which is to allow for taking possible additional housing numbers for neighbouring Local Authority areas under 'the Duty to Co-operate'. But this duty to Co-operate no longer applies.

2. Housing Issues

2.1 The Green Belt

(DEV2) The Green Belt should not be released for development unless exceptional circumstances justify it (Paragraph 136- 137 of NPPF). If the estimate of housing need has been overestimated, such release should not be needed.

2.2 Location

(DEV2) There should be less emphasis on big new housing estates, and more on use of brownfield sites and on small developments in villages to meet local need

(DEV 6) New homes should not all be built in large housing estates on the edge of existing towns. They will place more pressure on the infrastructure and lead to increased traffic commuting. New homes in outlying villages may be essential to maintain the communities there.

(DEV7) Neighbourhood Plans should be used to help decide suitable numbers and locations for new homes.

(ENV1) & (Para 3.2.8) Within sensitive and protected areas (including the AONB), developers should not be allowed to mitigate any loss of habitat by paying compensation as this very rarely results in equivalent habitat being replaced.

2.3 Affordable housing

(HOUS2) & (Paras 4.1.1 and 4.3.2 and 4.3.3 and 4.3.10) The Plan seems to have no functional policy to provide **truly affordable housing** in a county such as Dorset, where average house prices are acknowledged to be 10 – 14 times the average annual income.

(Para 4.3.12) The Plan appears to rely on market-led housing which, without strong affordability and quality conditions for planning consent and strict enforcement, is unlikely to create insufficient low-cost housing for purchase or rent for people on low incomes

Developers should not be allowed to appeal against supply of affordable housing on 'viability grounds'. If the developer cannot supply as promised, then the planning consent should be withdrawn or very large penalties imposed.

2.4 Low carbon homes

(ENV9) & (ENV3) For Housing, a third Strategic Priority should be added; Contribution to combat Climate Change and to strengthen biodiversity.

(Paras 3.8.4 and 3.8.11) The Council should set net zero carbon standards in all new buildings immediately and not wait for the Government's schedule of 2025. This would mean 100% use of low carbon energy, which is fundamental to meet our obligations towards zero carbon emissions without later requiring retrofitting.

(ENV9) The Plan should insist on very high standards of energy efficiency, building materials, insulation and sustainability in the design of all new buildings

(ENV2) & (ENV9) There should be a strong commitment to retrofitting existing buildings, including those in Conservation Areas, to make them more environmentally sound. This might require incentives for changing to renewable energy heating systems and improving insulation.

2.5 Second Homes

(Section 4.7) There are no conclusions to this problem in the plan. There are many concerns over second homes such as:

- Inflating house prices
- Creating 'ghost villages' where too few homes are occupied full time.
- Emitting further greenhouse gases in a time of Climate Emergency.

Possible solutions include:

- Permanent residency qualification
- A covenant on new houses
- Shared ownership schemes such as Community Land Trusts.

3. The Environment and Climate Change

3.1 Climate and ecological emergency should underpin all policies

The Climate and Ecological emergency (which is recognised by Dorset County Council) should underpin every policy in the plan. It is time for an urgent change in thinking and approach to landscape, sustainability and energy generation. Obsession with heritage and landscape alone is no longer sustainable.

(Section 2.1) The Climate and Ecological Emergency is given as a Strategic Priority for the whole Plan, and we welcome the statements of preserving natural capital and biodiversity, and that all new developments incorporate ecological net gain. But many of the statements in this section seem vague with few ideas that will affect the activities or behaviour of its citizens.

3.2 Ecology

(ENV2, ENV12) The Plan should require that all new developments include appropriate infrastructure to ensure all rivers and beaches in Dorset are clean and do not become polluted. The policy should be stronger and Dorset Council can make vigorous use of Section 106 agreements, Community Infrastructure levies and Nitrate Sensitive Area levies to make sure developers are held to the highest standards.

(ENV1) The value of local 'Green Infrastructure Plans' should not be underestimated. Policy ENV1 could be expanded to ensure that green spaces are provided wherever new housing or employment proposals would result in any settlement growing by more than 10%.

(Para 3.4.13-14) Sites for Nature Recovery which build existing and new Ecological Networks should be allocated at the same time as land is allocated for housing and jobs. Ecological Networks and sites designated for their biodiversity or Nature Recovery should be illustrated on all the inset proposal maps.

Section 2.5) The plan proposes to release land from the Green Belt for building houses. It justifies this in terms of 'sustainable growth' of the towns, and refers to 'exceptional circumstances'. The Green Belt provides essential ecosystems and a 'green lung' for the people in South East Dorset and BCP. Its preservation should not be negotiable.

(DEV2) The 'exceptional circumstances' that are quoted should instead be seen as part of the justification for Dorset Council to use the option offered by the National Planning Policy Framework that a planning authority may in 'exceptional circumstances' use a different method of calculating the level of housing growth. That option will reduce the need for new housing, and remove the need to breach the Green Belt.

(ENV1) & (Para 3.2.8) Within sensitive and protected areas (including the AONB), developers should not be allowed to mitigate any loss of habitat by paying compensation as this very rarely results in equivalent habitat being replaced.

(Section 6.4) Biodiversity could be considered part of the infrastructure, so Community Infrastructure Levy (CIL) payments which mitigate the impact of development could be directed towards restoring biodiversity.

(Para 3.3.4) The UK has more than 85% of the world's chalk rivers, an important and rare wetland resource. The two most westerly chalk rivers in the world, the Frome and the Piddle, arise and reach the sea within Dorset. The County has, therefore, special responsibilities for the safeguarding and stewardship of these two rivers and they deserve special recognition in the Local Plan.

3.3 Climate change

The Plan needs to be based on a strategy or roadmap to achieve net zero greenhouse gas emissions by 2050, as required by Section 1 of the Climate Change Act 2008, as amended in 2019, and include intermediate targets of a 50% and 75% reduction by 2030 and 2040 respectively.

The carbon footprint of the developments indicated by the Plan would grossly outweigh any planned reductions.

3.4 The 'Green Economy'

(Para 5.1, 5.2) & (ECON1) & (DEV2) The Plan needs a pathway for the rural economy with new workspace being built in many towns in the County and capitalising on opportunities for jobs in the "Green Economy"

A 'Green Economy' would be a green, local and circular one, generating a wide range of new jobs. For example; converting from fossil to renewable fuels, retrofitting existing buildings, enhancing wildlife habitats.

(Section 3.14) The Plan identifies biodiversity considerations which show that, in some rivers, flooding may adversely affect development sites. It does not actively identify opportunities to develop existing SSSIs (e.g., aquatic and bankside vegetation) for purposes of local tourism and investment. It largely focusses on reducing flood 'risk'.

4. Transport

4.1 General issues

(COM1) Transport is the single largest emitter of greenhouse gases in the Dorset Council area at around 40% of all sources.

(COM1) The Plan needs an integrated transport plan to link all Dorset communities, avoid unnecessary private car journeys, promote public transport and encourage walking and cycling.

(Section 6.3.3) & (COM2) Due to the severity of the climate emergency, the aim should be to reduce automobile use, rather than to avoid “significant additional” trips.

4.2 Public transport

(COM7) There needs to be a more comprehensive, strategic plan for a public-transport network to cut carbon emissions by radically reducing dependence on private vehicles.

(COM7) The town ‘hubs’ of Dorset should all be connected by high-quality public transport routes; while their hinterlands would be served by ‘spokes’ relying on traditional public, community, and on-demand forms of transport.

4.3 Greenhouse gas and noxious emissions from transport

(COM1) The Plan should include policies to cut transport-related CO₂ and noxious gas emissions to zero and reduce other pollutants (particulates etc.) to below safe levels.

(COM1) Research by the Royal Town Planning Institute specifies the need for a comprehensive package of interventions to reduce transport emissions. They advocate policies which firstly help reduce the need to travel, followed by shifting trips to active travel (walking, cycling), then to public and shared transport, and finally a change to vehicles using cleaner fuels

This hierarchy acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities.

4.4 New developments and transport

(COM1) Planning applications for all significant new developments should be accompanied by a coherent transport plan, in that these developments shall be truly ‘sustainable’. The issue of transport accessibility should not be treated as a separate exercise.

(COM2) There should be a coherent transport plan supporting all new developments.

(COM1) It is only by linking development permissions at every stage with such a transport vision that truly 'sustainable' development can be expected from the Local Plan. It is not adequate to treat accessibility using transport as a separate exercise

(COM7) Location of development on an existing transport corridor does not deliver net-zero carbon transport. The policy should be strengthened to ensure that zero-carbon transport solutions are delivered for the entire lifecycle of any development, not merely the first few years.

4.5 Parking

(COM8) Policies on parking should be set within an overarching Transport Strategy, and should be used to influence the use of private cars to encourage non-car transport solutions.

4.6 Electric Vehicles

(Section 6.7.9) & (COM9) The UK government has now brought forward to 2030 the ban on the sale of new petrol and diesel cars, with some hybrids allowable until 2035. The Plan states the date is 2040.

(COM1) The Local Plan must take into account the energy required for electric vehicles.

(COM9) There should be provision for electric charging at all new parking spaces. Spaces for car clubs should have fast charging points due to increased use of the cars.

(COM9) Dorset Council should develop policies and incentives need to be developed by Dorset Council in anticipation of driverless (electric) vehicles that can discourage the use of sole or low occupancy driverless cars, and actively incentivise shared occupancy.

5. Renewable Energy

5.1 Offshore wind energy

Offshore wind farms are barely mentioned in the plan; yet a Poole Bay wind farm 10-20km offshore on the scale of the Navitas scheme, could provide all the electricity for the households of Dorset and BCP at lower cost than new fossil fuel or nuclear generation

With increasing burden on power supply to charge electric vehicles and heat homes, and an increasing awareness of the need to decarbonise, developments such as that in Poole Bay should be welcomed.

(COM10) The World Heritage coast and its fossil record would not be greatly impacted by an offshore wind farm 10-20 miles from the coast. The view of the wind farm, far from adversely affecting enjoyment, would give many residents, especially the younger generation, hope for the future.

5.2 Onshore wind energy

(COM10) The Plan should actively support sites for on-shore wind farms and allow further sites to come forward. The balance of decision should shift in favour of low carbon developments. This draft of the Plan imposes many more conditions on the development of wind and solar farms than on fossil fuel extraction facilities.

(Maps p248-249) The maps of possible wind farm sites on p248-249 are highly restrictive and do not cover any sites in the western part of the County.

(COM11) The plan allows for small scale wind turbines less than 15m in height, but these are not economical for electricity generation, and the height limit should be removed. All applications should be judged on their own merits.

(COM10) & (Para 6.9.4) Community-led projects should be particularly encouraged but being community led should not be a condition for approval.

(COM10) The proposal that 'renewable development be allowed only 'if it causes little harm to the significance of a heritage asset' could imply blocking any wind turbine that can be seen from any point in a SSSI. The balance of decision should shift in favour of low carbon developments.

(Section 6.8) Solar PV arrays on farm buildings, domestic and commercial roofs and solar farms should be encouraged in the Plan.

(COM10). The plan should encourage every form of renewable energy including micro-hydro electric and geothermal.

5.3 Fossil fuel development

Whilst the draft Local Plan has policies for renewable energy it says nothing about fossil fuel developments. The Plan should include a strategic policy statement opposing the further development of hydrocarbon resources which is then detailed in any new Minerals Plan. The proposed extensions of Wytch Farm and drilling in Puddletown are incompatible with Dorset's aim of carbon zero.