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Requester ID:

Consultee ID:

Comment ID's:



# Dorset Council Local Plan Consultation January 2021



Planning affects us all. The council's planning policies are set out in Local Plans which are the legal starting point in determining planning applications. Public and stakeholder engagement is an important part of the plan making process. Involving residents, businesses, organisations, experts, infrastructure providers and town and parish councils allows local knowledge and expertise to be gathered from a wide range of perspectives.

Dorset Council have produced a draft Local Plan containing proposals for guiding future development in the Dorset Council area up to 2038. The plan outlines the strategy for meeting the needs of the area such as housing, employment, and community services including schools, retail, leisure and community facilities. The plan directs development to the most suitable locations near existing facilities and detailed policies promote high quality development that respects and enhances the character of each area. The plan also protects Dorset's natural environment and contributes towards the mitigation and adaptation to climate change.

Between 18 January 2021 and 15 March 2021 you are able to comment on the proposals.

A consultation on the plan will begin on 18 January 2021 and end on 15 March 2021

### How can you find out what's in the plan?

The Dorset Council Local Plan consultation will be available on the council's website at www.dorsetcouncil.gov.uk/dorset-council-local-plan

Paper copies of the plan are available for loan from your local Dorset Council library (Covid-19 permitting) www.dorsetcouncil.gov.uk/libraries-history-culture/libraries/find-your-local-library/dorset-libraries.aspx Find out more at:



We are holding webinars throughout the consultation period on key themes within the plan. Each webinar will last approximately 40 minutes and will consist of a short presentation followed by a question and answer session.

### dorsetcouncil.gov.uk/dorset-council-local-plan-webinars



We also have a dedicated phone line available during the consultation period

Monday to Friday **01305 252500** 10am and 2pm



Town or Parish councils, organisations or community groups can attend a planning surgery during the consultation period to discuss any queries with officers. **Limited spaces are available. Telephone 01305 252500 to reserve your slot. Tuesday to Thursday, from 10am until 2pm.** If you have any difficulty accessing information please telephone 01305 252500.

### How can I make a comment?

To comment on the proposals, please:

- Make sure you give your name and either postal or email address along with your postcode so that your response can be considered appropriately.
- Use the official form.
- Make your comments within the consultation period to ensure they are considered.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Continue on separate sheets if necessary.

#### Please note:

- Representations cannot be treated as confidential. By completing a representation, you agree to your name (but not your address) and comments being made available for public viewing.
- The council do not accept any responsibility for the contents of the comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.

### You can respond:



#### Online

Submit your response online at the following link

#### www.dorsetcouncil.gov.uk/dorset-council-local-plan

The benefits of doing your response this way are as follows:

- less impact on the environment as we do not need to use paper or postage
- you'll be emailed a copy of your response a confirmation once submitted
- you'll also be able to start your response and return to it at a later date a confirmation email will send you a link to where you left off
- you can upload supporting information to your response

E-mail

We also accept responses emailed to us, as long as they

are completed on this form. Please send responses to

### planningpolicy@dorsetcouncil.gov.uk



### Written responses

There are paper copies of the response form available upon request for those without internet or computer access.

Please telephone **01305 252500** to request your copy.

### Part A

# Please complete one part A form In what context are you responding? Tick as applicable Organisation AAgent Individual ΥY (please specify) Please complete your details - remember to include your name and either postal or email address to have your response considered. Name\* Arne Parish Council Organisation Address line 1\* Address line 2 Address line 3 Town Postcode\* Email address\* Clients details if applicable: Name\* Organisation Address line 1\* Address line 2 Address line 3 Town Postcode\* Email address\*

<sup>\*</sup>essential fields

# **Group Representations**

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please how many people support the representation.	state here
Pleasetick the box if you would like to be notified of future progress and	

# Part B: General questions

# Please complete one part B form for every part of the plan you wish to make a comment on.

vvnich paragraph / policy / section / chapter of the plan are you referring to?
Strategy and Topics
Tick (or mark with Y) as applicable
Do you agree with the suggested approach and what it is trying to achieve?
Agree Agree subject to changes Disagree X
Do you agree with the suggested wording?
Agree Agree subject to changes Disagree X
How could the paragraph / policy / section / chapter be amended to reflect your concerns?
<b>DEV 1</b> : The vision for Dorset in the current DLP is subjugated to the perceived need to subscribe to the Housing Targets provided by Central Government's Standard Method. There is little that does not simply follow that or seek to justify that decision. Thus the issues of how Dorset can proceed into a post Covid, post Brexit and Climate and Ecological Emergency future are inadequately addressed.
<b>DEV 2 and ECON 1</b> :It gives an impression of being a collection of the old district plans drawn up before the above priorities and 'stitched' together. What is needed is a rethink of the need for genuine Sustainable Development within the county. The vision embedded in the current document does not steer the County into a low carbon future of energy of efficient housing, 'green economic development', enhanced public transport over cars, and carbon free energy generation and use.
<b>DEV 2.</b> 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.
<b>DEV 5</b> . We find excessive the number of houses (30,481) Dorset Council propose to build following the Standard Method provided by Central Government. Dorset CPRE challenges that calculation as 47% above actual need.
The plan should address and decline to accept the housing targets provided by the 'Standard Method' which is out of date and independent estimates suggest are grossly in excess of the actual local need. The Government response below and the NPPF guidelines indicate how this can be done:
"Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in <a href="Paragraph 11b of the NPPF">Paragraph 11b of the NPPF</a> or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints."
Dorset is a very special county as comments in the Introduction of the plan concede, with many

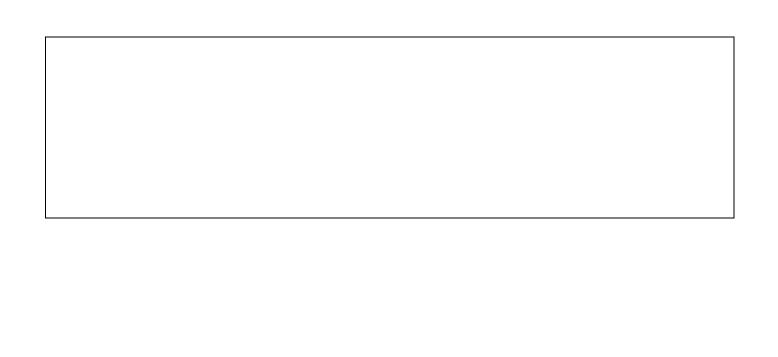
areas precluded from development and an economy in which tourism plays a large part. There is thus a need to protect landscapes, habitats, heritage and wildlife; and the current plan threatens all this with

urbanization of significant areas. What is needed is a robust defense of our smaller housing needs (probably around 20,000, as suggested by other assessments such as the Dorset CPRE, distributed to where needed) and an equally robust vision of a low carbon Dorset, a beacon of sustainable agriculture, fisheries, industry, transport and tourism. The current plan is really "business as usual" with marginal concessions to the C&EE.

# Part C: Sites for housing and employment

Complete one part C form for every site you wish to make a comment on. Part D of this form gives an opportunity to comment in more detail on the additional site options at Alderholt, Gillingham and Wool.

Which site are you referring to?	Wool
Do you agree with the allocation	of this site?
Tick (or mark with Y) as applicable	
Agree Agree subje	ect to changes Disagree X
Is there anything not covered within	n the policy that should be considered in relation to the site?
as evidence submitted to PLP enq were it a biodiversity index Wool w	sting AONB is in fact an area rich in biodiversity (over 3,000 species) uiry detailed. The classification AONB is largely a landscape one, rould be included. The parish at present contains an SPA, an SSSI e parish), 9 SNCIs and a LNR and 13 Ancient Woodlands.
farming land and threaten the Rive no quantity of existing employment anticipated. Most of those taking up	ally out of scale with the existing village, are replacing organic r Frome catchment with increased pollution and drainage. There is opportunities and the DIP has as yet failed to generate the growth o residence would thus be adding to the commuting load on the A352 e particularly during the now extensive holiday 'seasons'.
	er of workers commuting by car or van – 79.5%. Our roads are se adding to the quantity of carbon emissions.
Are there any community infrastruc	ture needs within the area that should be considered?
	s serving Wool is at capacity and thus further development without RAMSAR sites of the Frome Valley and Poole Harbour.
providing commuting capacity is ac leading to considerable congestion and investment in public transport,	ction of a railway and a major road. The former while in theory stually under used. Meanwhile it disrupts the flow of the main road at peak periods and tourist seasons. Unless there is a major rethink the provision of a railway bridge with underpass to replace the n of a bypass all beyond the budgets of Council or developers this
The existing school and surgery are	e not adequate to cope with a large influx of people.



# Part D: Areas where there are different options for growth

At Alderholt, Gillingham and Wool there are various options for growth. Please use this section of the form to comment on those various options.

Alderholt	
What level of small scale growth and major expansion should take place at Alderholt?	
If Alderholt was to be identified for significant expansion, what improvements would be needed to improve the self-containment of the settlement?	
Are there any factors that may inhibit the deliverability of significant expansion of Alderholt?	
Gillingham – Land to the west of Peacemarsh	
The Gillingham Southern Extension will deliver growth for the town over the coming years. Further land has been identified to the west of Peacemarsh which could meet the longer term needs of the area however it may impact on the delivery of other sites at the town. Should this site be allocated in this plan?	No
Any comments?	

#### Wool - Land south of Hillside Road

Do you think that this site should be allocated in addition to the sites proposed to the west of the village?	Yes	No	Х
Any comments?			

### Part E: Specific discussion points

The following questions relate to specific issues where the Council are seeking focused responses and therefore are asking targeted questions. This will help the Council to progress the plan reflecting the comments received on these issues.

#### Vision and Strategic Priorities

Do you have any comments on the Vision and Strategic Priorities?

#### Any comments?

.We are concerned for the unique environment of this area of Dorset by the proposal of so much construction. The plan talks of land being available for 39000 dwellings so that unmet needs from neighbouring authorities can be met. It is important that this 'unmet' need is quantified. In Dorset Council area there were (April 2020) over 4000 empty houses and a further 5200 in the BCP area. It would be good to see if and how these could be brought into use.

The plan speaks of the creation of 21000 new jobs and 30000 New Homes over its lifetime. It is less clear where these jobs might come from. Employers already note a lack of local young recruits as young people are forced out of the area by high house prices and low salaries.

Specifically we fear that much of the building in the next few years would be accomplished with out-dated technologies.

The new Building Regulations requiring high standards of environmental performance will not come into force until 2025. Has Dorset Council enquired of building companies what they are prepared to do now in the light of the current crises?

The Plan acknowledges builders may challenge the demands of new technologies. We would want to see in the Plan more emphasis on the reduction of carbon emissions and builders' intentions in this regard. Dorset's commitment to carbon neutrality should be made obvious.

We would like to see immediate proposals to adopt green energy technology The Plan holds that sustained growth must not come at the expense of the environment – we would like to see how Dorset Council is preparing to achieve this balance.

The Plan has a heavy focus on building despite the potential cost to the climate and environmental crises. Will Dorset Council review this goal if the Responses indicate that these construction targets are not what the people of Dorset need?

It appears this plan was drafted before the Climate and Ecological Emergency was declared by DC.  Over all it receives little attention in the plan outside of the Environment Section where the good words are largely undermined by the planned actions in the Development Sections.

#### Spatial Strategy / Settlement Hierarchy

Do the boundaries of the four functional areas reflect how the area's housing markets and economy function?	Yes X	No
Is the distribution of housing between and within the functional areas appropriate?	Yes	No X
Do you agree with the proposed hierarchy of settlements?	Yes	No X
Do you agree that there is a need to amend the green belt to enable development?	Yes	No X

How could the strategy/policy be amended to reflect your concerns?

If the housing numbers were reduced to the **actual need** then they could be dispersed amongst areas where Neighbourhood Plans would indicate suitable numbers and location. Any subsequent shortfall could be addressed by construction of new communities where infrastructure could be created as needed, and climate and environmental concerns given adequate consideration. The suggestion that there is a need to release land from the 'green belt' is thus strongly refuted.

There is also a focus on large developments adjacent to existing towns or large villages. This ignores the needs of smaller villages, frequently noted in their Neighbourhood Plans, which need housing to provide for local 'low cost' housing needs and to maintain their existing infrastructure and services.

A much greater emphasis needs to be placed on brownfield sites providing accommodation, repurposing redundant retail space and creating employment and accommodation within the towns.

Residents increasingly do not want to have to rely on their own transport to meet the needs of everyday living. All too many new developments are being undertaken that appear to be 'stuck out on a limb' without the supporting infrastructure or sense of community.

### Neighbourhood Plans

Do you have any comments on the approach to establishing housing targets for neighbourhood Plans?

Any comments?

Neighbourhood Plans should be the basis of development rather than regarded as subordinate to the Local Plan and in receipt of its decrees.

Neighbourhood Plans were prepared in the belief that all subsequent planning applications would have to conform to them Now we learn they are to "sit alongside "the Local Plan. We note that Neighbourhood Plans cannot offer to build fewer houses than the Local Plan requires. More weight needs to be given to carefully thought out conclusions, knowledge and opinions contained in Neighbourhood Plans as against the proposal in the Local Plan to build in excess of need.

### Housing Mix

Do you agree that major residential development sites should provide at least 20% of

the homes as accessible and adaptable homes to meet the needs of the elderly and less mobile?	Yes	No	X
Any comments?			
The figure of 20 % seems high. The Neighbourhood plan would be a better indicator of A major residential development should consult the local Public Health Officer to establ less able in the neighbourhood rather than adopt an arbitrary figure.		•	

### Affordable housing (proposals to be refined through detailed viability testing)

Do you agree that affordable housing should be delivered by developments at different rates across Dorset?	Yes	No	X
Do you agree with the suggested tenure split?	Yes	No	X

#### Any comments?

There is inadequate vision within the plan to address the need for social and genuinely affordable housing. The Government's definition of affordable at 80% of market rate does not make housing affordable with the low incomes in the county where the average house price is 10 - 14 times the average annual income. I shall use the term 'low cost' housing, to rent or buy, to describe the genuinely affordable housing needed by many local individuals and families.

Reliance on developer-led and market-led provision is highly unlikely, in fact many planning experts would maintain impossible, to supply low cost housing. Without adequate planning controls developers will promise too little low cost housing and probably renege on those planned claiming they make the development financially 'unviable'. Only the imposition of planning controls will force down the price of land sufficiently for any developer to provide sufficient 'low cost' housing. Developers should not be allowed to appeal against supply of affordable housing on 'viability grounds' which essentially means they paid too much for the land. If the developer cannot supply as promised on acquiring planning consent then the consent should be withdrawn. This stance would ensure developers pay realistic sums for the land.

Other planning controls are needed to ensure that developments are constructed appropriately to have low carbon construction and zero carbon operation.

Consideration should be given to building 'low cost' housing on Council owned land and to persuading landowners to provide lower cost land at certain sites to provide for local needs.

Possibly the only concessions to this should be allocations of land adjacent to existing settlements dedicated to providing social and **genuinely affordable housing** that the current plan with its reliance on developer-led, market-led housing will simply not provide. The current plan will, ironically with all the housing allocations, fail to provide the housing most needed in the county. We will have many more houses bought by those retiring into the area, commuting from the area, acquiring second homes and investing to let and yet still leave many families living in inadequate accommodation with its raft of associated costs in health, support, education and with no reduction in carbon emissions.

It would seem to be an issue that could only be resolved by the supply of Council/Community Housing with rents that take into account the local populations circumstances. A percentage of Market Rate would not help a lot of people and is a relatively blunt instrument to strike the right balance. Furthermore, in order to maintain the supply it would not seem sensible to allow 'right to buy ' schemes despite their attraction.

Affordable homes are consistently much smaller and built to a lower standard than other parts of the development. This policy should require affordable housing to be built to the same type, size and mix as the remainder of the site.

#### Housing with care provision

provide affordable housing?	
Are there any practical limitations to this approach?	Yes No
Are there other approaches that could be taken to deliver care for those who cannot afford to pay market rates?	Yes x No
Any comments?	
Again planning controls on provision ensure that land can be acquired at a price low enougeveloper to provide suitable 'low cost' accommodation.	ugh to enable a

#### Second homes

What approach do you think the Council should explore to address the pockets of high second home ownership?

#### Any comments?

This issue is a challenge but one which Neighbourhood Plans have challenged successfully for new builds in Cornwall and Devon. A policy of 'Rural Exception Sites' dedicated to providing only 'low cost' housing would accommodation for local families in areas of high demand for second homes.

Second homes have the negative effects on an area of inflating house prices and creating 'ghost villages' where a significant proportion of the houses are not lived in for substantial periods of the year having a negative effect on the community.

We are concerned about the trend for more second homes in Purbeck. Their occupancy is amongst the highest in Dorset. We would want all newbuilds to be available only to those who work locally or will have this as their principal residence- qualifications to be protected by covenant. In winter some villages show few lights - we want to see a return to viable vibrant communities.

For existing dwellings ideally they should only be sold on as Principal Residences. A difficult area as one wouldn't want to preclude buy to let - which may meet a housing need, nor deprive homeowners of holiday let income.

### Gypsies, Travellers, Travelling Showpeople

Do you have any comments on the proposed site allocations for Gypsies, Travellers and Travelling showpeople?

Any comments?		
The number of sites seems excessive.		
Self build housing		
Do you think the council should identify sites for self / custom build housing?		
	Yes	No
Can you suggest any additional sites which could be allocated for this purpose?	Yes	No
pulpose:		
Any comments?		
Economy		
<del></del>	Г	
Should any sites be added or removed from the list of Key Employment Sites in Appendix 6?	Yes	No
Any comments?		
The 'Key' to these sites being 'Key' is to provide investment/incentives to attract app	ropriate by	isingeens to
create the necessary employment.	Tophate bu	1311163363 10
There is an assumption that economic growth will come from existing and expanded 'E	- - - - - - - - - - - - - - - - - - -	nt Sites'
This is a somewhat 20 <sup>th</sup> century thinking. Employment now is becoming far more diver		
home or in small units associated with the needed agricultural diversification.		
This then tends to skew housing making it adjacent to planned employment expansion	without ar	ny genuine
indication that such expansion will be realized.		

We are concerned about the struggles of town centres. We want to see proposals regarding the increasing

number of commercial buildings and shops that stand empty over long periods- these are potentially windfall or brownfield sites .Market forces have brought increasing numbers of estate agents and charity shops to our High Streets but this is a poor fit with the needs of the community. We will not revive the economy simply by selling our houses to one another <b>or</b> our clothes.  We need ventures developing all aspects of green energy. Post Covid, more people will want to work from home – more data will be needed about this new economy.

Town centre hierarchy	
Do you agree with the classification of the centres in the proposed hierarchy?	Yes No
Are there any additional centres that should be included?	Yes No
Any comments?	_
Hot food takeaway	
Should the council look to restrict hot food takeaways around areas where children and	Yes No
young people congregate?	163
Any comments?	
If one is considering areas around schools restriction is indicated.	
However, social congregations of young people are a different consideration and takeau in areas where adults and families might also congregate. Just as important are the con low carbon packaging, recyclable packaging and the collection of these items. Should the responsibility of the vendor?	siderations of waste,
Electric vehicle charging points	
The plan requires the provision of the infrastructure for electric vehicle charging on development sites. Do you agree with this proposal?	Yes x No
Any comments?	
The roll out of electric vehicles requires adequate charging points in public areas as wel developments. Consideration should be given to the payment arrangements for the service plethora of companies and particular payment methods makes moving around a challent compared to refueling by credit card at carbon fuel centres.	vice – the current
Electric cars are not carbon or materials free in production or maintenance. Personal tra provided more readily by public transport and active transport. Greater provision for thes	•

Wind turbines			
The locations identified as opportunities for larger scale wind developments are shown on Figure 6.5 and Figure 6.6. Do you support the principle of allocating any of the areas Yes for wind turbines?	х	No	
Are there any planning issues that would need to be resolved to enable community backing to be secured?	Х	No	
Any comments?			
The need for decarbonizing Dorset's energy requirements cannot be met only by onshore wind PV arrays. Both can play a part but land is much needed in Dorset for farming, amenity, health landscape, biodiversity and the important tourism industry. Priority thus needs to be also given energy consumption by improving buildings, reducing travel, decarbonising agriculture etc.  The plan for substantial offshore wind generation off the coast of Dorset and BCP areas needs revisited now the Climate Emergency has been more widely recognized. It could generate the energy required. Llandudno and Brighton both have attractive off-shore wind farms.	& we to re	ellbein ducino	ig, g
Broadband		_	
The plan requires the provision of full fibre broadband connections to each home on major development sites. Do you agree with this proposal?	х	No	

### Climate change

Any comments?

What else could the local plan do to mitigate climate change and help people adapt to its effects?

### Any comments?

Rather than being the last section for comment, arguably it should be the first. We do not find the proposed plan consistent with DC's declared Climate & Environmental Emergency. It needs to have it at the forefront of its revised Local Plan. The current offering merely makes vague statements and will effect little change in the activities or behavior of its citizens or those who act on the Dorset environment. It really is a document supporting 'business as usual' with a just a few concessions to the Council's own CEE Strategy.

be undertaken with the Climate and Ecological Emergency leading the changes. Until this happens no further development should acquire planning permission and, if possible, current permissions reviewed.

Thank you for your comments

### **About You**

We collect diversity information, not only to ensure any changes do not unfairly impact on specific sectors of the community, but also to try to make sure our consultation response comes from a representative sample of local residents. We would appreciate if you can complete the following details if you are responding as an individual.

Which age group do you belong to?	
Under 18 18 - 24 25 - 34	4
35 - 44 45 - 54 55 -	64 65 or over Prefer not to say
What best describes your gender?	
Female Male	
Non-binary I use another term	Prefer not to say
The Equality Act 2010 describes a person as disable condition that has lasted, or is likely to last 12 month on their ability to carry out normal day-to-day activiti sclerosis and HIV/AIDS for example) are considered diagnosed.	ns; and this condition has a substantial adverse effect es. People with some conditions (cancer, multiple
Do you consider yourself to be disabled as set of	out in the Equality Act 2010?
Yes No	Prefer not to say
If yes, please tell us which type of impairment applie impairment, so please select all the impairments that	•
Physical disability	Learning disability /
Long-standing illness or health condition	Mental health condition
Sensory impairment (hearing, Sight or both)	Prefer not to say
	Troid flot to day
Other (please specify)	
Please specify your ethnic group?	
White British	
White Irish	
Gypsy/Irish Traveller	
Any other White background	

	Asian/Asian British - Bangladeshi			
	Asian/Asian British - Chinese			
	Asian/Asian British - Indian			
	Asian/Asian British - Pakistani			
	Any other Asian background			
	Black/Black British - African			
	Black/Black British - Caribbean			
	Any other Black background			
	Mixed ethnic background - White and Asian			
	Mixed ethnic background - White and Black African			
	Mixed ethnic background - White and Black Caribbean			
	Any other mixed background			
	Prefer not to say			
	Any other ethnic group (please specify)			
<b>10</b> /10				
	best describes your sexual orientation?			
Bi	Gay/lesbian Heterosexual/Straight			
I use a describ	nother term (please			
Prefer	not to say			
	nt best describes your religion/belief?			
Buddh	nist Christian Christian			
Hindu	Muslim			
Sikh	No Religion			
Other	(please describe)			
Prefer	not to say			

### Privacy statement

This planning consultation collects your personal data to ensure fair responses to the Local Plan. Your data will be held according to our data protection policy available at:

www. dorset council. gov. uk/your-council/about-your-council/data-protection/service-privacy-notices/planning-policy. aspx