

Dorset CAN

Dorset Climate Action Network and supporting organisations

Response to the draft Dorset Local Plan

Summary

We salute Dorset Council for building on the inherited Plans of six previous authorities and producing a three-layered Plan with county-wide policies, strategies for four functional areas and local plans for 27 towns, with supporting appendices and sustainability assessments.

Dorset CAN's appraisal of the Local Plan is driven by our commitment to mitigation of climate change, reversing the loss of wildlife, and promoting sustainable use of the world's resources, social justice and the resilience of communities.

We see the Local Plan as a powerful tool for pursuing those purposes and, crucially, for implementing the Council's own Climate & Ecological Emergency Strategy and Action Plan.

We applaud the clear description in the Plan of the rich heritage of the county in terms of landscape, natural habitats, geological features, historic towns and buildings, and of the importance of this heritage for the County's economy and the quality of life of its people.

On reading the Development Strategy, we are therefore baffled to find that the Council has chosen to base the Plan on a scale of growth in housing, workspace and supporting infrastructure which cannot be achieved without grave damage to that rich heritage.

The Council has ignored the opportunity, offered by government, to use Dorset's exceptional heritage as the reason for taking an alternative approach to calculating the scale of development that is needed and that is within the capacity of the County to absorb.

The adverse impact of the Plan's proposals on landscape, biodiversity & climate change is shown to startling degree in the Sustainability Assessments. The Council could not keep its pledge to "ensure that all new development incorporates ecological net gain".

We therefore urge the Council to think again, to choose a level of growth based simply on local needs, and thereby to draw back from grave incursions on the AONB, encroachment on the Green Belt and the placing of heavy pressure on regions already under severe strain.

Subject to this radical reduction in planned growth and in incursion on protected areas, we endorse the broad strategy for allocation of development between the four functional areas and the two tiers of towns. We wish to see modest levels of development in the villages.

In the policies outlined in the sections on Environment, Housing, Economy and Community Infrastructure, we wish in general to see higher emphasis on the overarching challenges which are clearly stated in the Climate and Ecological Emergency Strategy and Action Plan.

In the field of Environment, we urge a strong emphasis on Nature Recovery Zones; insistence on the highest social and sustainability standards in all new development; and systematic use of pre-application processes in development control.

In Housing, we urge the Council to ensure that all new dwellings are resilient in the face of climate change; to establish sharp ongoing analysis of the need for and supply of all types of affordable homes; and to consider imposing high council tax rates on second homes.

We wish to see movement towards a Green Economy, sustainable in use of resources, with a strong dimension of local self-sufficiency (e.g. in food) and of circular activity including use of local timber in new buildings. The Council should be active in securing the development of workspace, the regeneration of town centres and economic diversification on farms.

We welcome the statement that the Council will deliver improved infrastructure across the whole of Dorset. Crucial elements in this are local community buildings and structures, including services in villages; much improved county-wide networks of public transport and of routes for safe walking & cycling; an ambitious approach to the production of renewable energy; and phasing out of fossil fuel production in Dorset.

Introduction

Dorset Climate Action Network (Dorset CAN) was established as a county-wide network across Dorset Council area and BCP in October 2020. It is in the process of seeking legal status. Meanwhile, it has over 400 members, including the leaders of many civil society groups and a number of town and parish councils.

Aim of the Network. Dorset CAN has been set up in response to the rapidly growing public concern about the impact of climate change, the use and abuse of the world's resources, the loss of wildlife and the related threats to social and inter-generational justice at global, national and local level. The Network aims to stimulate awareness of these issues and to support action by people and local organisations throughout the wider Dorset, as a complement to action by national government, Dorset and BCP Councils & other agencies.

Response to Climate and Ecological Emergency Strategy. On 20 January 2021, Dorset CAN submitted a strong collective response to the Climate and Ecological Emergency Strategy and Action Plan published by Dorset Council. In that response, we offered support to the Council in shaping and implementing the Strategy and Action Plan. We expressed our wish to be both a friendly critic and a creative partner of the Council, particularly on those parts of the initiative which relate to action by the citizens and the civil organisations and local authorities of the county.

The Local Plan. We salute Dorset Council for building on the inherited Plans of six previous authorities and producing a three-layered Plan with county-wide policies, strategies for four functional areas and local plans for 27 towns, with supporting appendices and sustainability assessments. We see the Local Plan as a powerful tool for promoting the well-being of the people, the economy and the environment of the county. Crucially, the Plan, and the active planning process that it embodies, can and should be used by the Council to pursue many of the purposes and actions set out in the Climate and Ecological Emergency Strategy and Action Plan.

Active planning. As a broad point, which is applicable across the wide scope of the Local Plan, we wish to see the Council's planning powers used not only in a passive and reactive way but also as an active force to make good things happen. The zoning of land is a passive process, which does not in itself ensure that the land will be developed in a timely way or to the quality and sustainability standards that are needed at this time of climate and ecological crisis. Development control is often a wholly reactive process, dependent on the timing and initiative of a private developer. These are indeed essential parts of the game, but they need to be supported, very often, by an active drive by the planning authority to secure the necessary development. We offer examples of this throughout our response .. for example in relation to affordable housing, creation of workspace, extension of the cycleway network, and uses of vacant floor-space in town centres.

Our standpoint

Our standpoint in assessing the draft Local Plan is based on the purposes which drove the creation of our Network and its rapid process of evolution as a voice for those who share our Aim. We have asked :

1. Are the Plan proposals consistent with the overarching need to prioritise addressing the Climate and Ecological Emergencies, in order :
 - a. to enable Dorset to make rapid progress towards Net Zero Carbon?
 - b. to preserve and enhance the biodiversity of Dorset ?
 - c. to build a resilient local economy based upon the sustainable use of natural resources, with a strong element of green jobs and circular activity ?
 - d. actively to promote reductions in greenhouse gas emissions to the level and dates required ?
2. Will the proposals ensure the health and wellbeing of all residents by guaranteeing :
 - a. clean air and water ?
 - b. access to open space and opportunities to engage with natural ecosystems ?
 - c. availability of suitably affordable, good quality, energy-efficient homes & workplaces ?

- e. access to affordable sources of clean energy ?
 - f. access to affordable and sustainable public transport and to safe walking and cycling routes ?
 - g. protection from the impacts of rising temperatures and extreme weather (e.g. floods, coastal erosion, wildfires, overheating, and disease) ?
- 3 Will the Plan recognise the demand for social justice, and result in a more equitable distribution of the benefits of new development within Dorset (both geographically and between income groups) ?
4. Will the Plan empower communities by devolving decision-making to the lowest possible levels in the community ?

In making these assessments, we will draw upon our collective response to the Council's Climate and Ecological Emergency Strategy, which made substantial reference to the role of planning in furthering the purposes stated above.

Our comments are focused mainly on the 'Topics' section of the draft Plan.

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Section 1 Introduction

The chapter starts with a brief pen-portrait of the County. It then notes a series of issues that must be taken into account in preparing the Plan. These issues are in three groups – environmental, social and economic.

The environmental issues include climate change; the fragile natural environment; the ongoing processes of flooding and coastal erosion; the rich heritage of the county in terms of landscape, natural habitats, geological features, historic towns and buildings, ancient monuments; and, as protection for this heritage, a wide range of global, European, national and local designations, including the Green Belt around the west side of the BCP conurbation – with a summary map (Figure 1.2) showing the density of these designations.

Need for ‘roadmaps’ to zero emissions and reversing the loss of wildlife. We are glad to note this initial emphasis on climate change, threats to a fragile environment, and the rich and diversified heritage, which we strongly agree are major factors in drafting a Plan. However, we regret that the Council has not yet produced clear ‘roadmaps’ to zero emissions and to measurable revival in wildlife habitats and populations. These roadmaps which would show the scale of actions, including actions in field of planning, that must be taken within the Plan period to 2038.

The social issues include the local need for housing, with a focus on high house prices and high proportions of second homes, which make it difficult for lower-paid workers and young people to find homes; the lack of public transport, the heavy dependence on cars for travel between home and work and the consequent need to create ‘sustainable locations’; the crisis of public health and well-being, and the need to encourage cycling, walking and other outdoor activity; and the problems connected with an ageing population, social isolation and loneliness, and the need for appropriate and adaptable housing.

Win/win/win solutions. We welcome this emphasis on social issues, the challenge of achieving social justice and of building resilience into communities. These issues all have palpable implications for action by Dorset Council using its powers in planning, housing, transport, social services and other fields; and for close linkage and cooperation between the Council’s different arms. We point (for example) to the win/win/win links between protecting the natural environment, reducing the use of fossil fuels and promoting physical and mental health.

The economic issues include Dorset’s relatively low-paid workforce, with low rates of unemployment but much part-time or seasonal work; the high levels of commuting into jobs in Dorchester and BCP; the still very patchy provision of broadband; and the fragility of town centres in the face of the rise in on-line purchasing.

Local economies. We share the concern about these issues and wish to see a major effort to diversify local economies within the county, with strong focus on green jobs and circular economies which also contribute directly to solving the climate crisis.

This online Chapter does not provide any ‘box’ for comment. But it serves to justify our call, in subsequent chapters, for strong linkage – not well articulated in the draft Plan – between the Climate and Ecological Emergency Strategy and the Local Plan. The gold and silver threads of action on climate and on wildlife should run through the whole fabric of the Local Plan

Section 2 The Development Strategy

This section starts with the statement that “The Dorset Council Local Plan’s overarching objective is to contribute to achieving sustainable development, which is generally accepted as being ‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs’”.

Need for a sharper statement of principles. This only states the underlying principle of sustainability, dating from the Rio Conference of 1992. Dorset CAN would like to see a sharper and updated statement of principles, referring to the UN Sustainable Development Goals and (crucially) to the targets and policies set out in Dorset Council’s own Climate and Ecological Emergency Strategy, which are derived from section 1 of the Climate Change Act 2008, as amended in 2019.

Objectives. The text then states some well-worded Economic, Social and Environmental Objectives – balanced and overlapping with each other. We wish to see that balance and linkage pursued in all aspects of the Local Plan. The wording of the Economic objective should be extended to include reference to a “green, circular and truly sustainable economy” The Social Objective text should end with “.. long-term community well-being and resilience.” We endorse the Environmental Objective without change.

Vision. The text then offers a Strategic Vision, which is stated as “reflecting the environmental quality of the area ... building on the pattern and hierarchy of settlements ... and recognising the needs of the more rural areas”. We would wish the wording of the Vision to recognise not only the needs, but also the social, economic and cultural contribution that can be made by all communities in the county – urban and rural. We urge the Council to disseminate this Vision among the people of the county and to infuse its own staff with a mission to promote and pursue the Vision, in cooperation with all in the county.

Strategic Priorities. The text then offers a set of Strategic Priorities. This includes the following reference to Climate Change :

“**Climate and ecological emergency.** We will take actions to minimise the impact of climate change, including minimising flood risk, and to reduce the impact on the climate, by locating and designing developments to reduce distances travelled and minimise energy use. We will support renewable energy developments appropriate to Dorset. We will ensure that all new development incorporates ecological net gain to help deliver the aspiration to reverse the current decline in protected species and habitats.”

We call for substantial strengthening of this statement, which makes no reference to the need for rapid reduction in greenhouse gas emissions, as required by law, nor does it convey the vigour that is needed to truly address either the climate crisis or the ecological emergency.

The section on **Strong healthy communities** should be extended to say that ‘All new development will be so placed and designed as to maximise the use of public transport, walking and cycling, with accompanying infrastructure to assure this’.

The need for housing and employment land.

The text then addresses the need for housing and employment land, starting with a crucial pair of sentences.

“The level of housing growth that needs to be accommodated in Dorset has been derived from the Government’s ‘standard method’, whilst also taking account of unmet need from neighbouring areas. The requirement for employment land in Dorset has been derived from a workspace strategy.”

From that apparently harmless phrase arises an army of demands for housing numbers, for housing sites spread around the county, for land to create workspace, therefore for significant new zoning of land for development beyond what is already shown in existing development plans, including large use of greenfield sites (some within the AONB), for breaches of the Green Belt in South East Dorset, and consequential calls for increase in infrastructure and services, involving further use of land and of crucial resources which will embed yet more energy and create yet more emissions of greenhouse gases, with adverse impact on the purposes and targets of the Climate and Ecological Emergency.

The available alternative. Despite these dire consequences, the Plan does not mention, never mind address, the option that is offered by the National Planning Policy Framework (NPPF), that a planning authority may in 'exceptional circumstances' use a different method of calculating the level of housing growth that is needed.

Text of NPPF paragraph

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

Simply a starting-point. Moreover, the Council does not mention the clear guidance from Government that the standard method of assessing housing need is simply a starting-point for determining the level of need; and does not override the provisions in the NPPF for protection of the Green Belt or of the Area of Outstanding Natural Beauty or other protected areas. Since the draft Plan was published, the Government has reiterated that advice :

"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 Paragraph 11b of the NPPF 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 are most appropriately located.

"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system#proposed-changes-to-the-standard-method-for-assessing-local-housing-need>

Housing need estimate used in the Local Plan. Ignoring this guidance from Government, the Council accepts the standard method for calculating the need for new housing. Noting that the Plan period will run up to 2038, the Plan then states a 'local housing need' in Dorset of 1,793 net additional dwellings per annum which means a total 30,481 new dwellings over the period 2021 to 2038. It then further notes that this total may ("in view of national housing policy") need to be added to a figure for unmet need from neighbouring areas (as yet unknown) to give an overall 'housing requirement figure' for Dorset. This consideration is then reinforced by what appears to be a deliberate policy of over-supply of land for housing, explained as follows :

The intention is "to identify ... sufficient land to meet more than the current requirement. This not only gives flexibility to respond to the Government's proposed changes to the 'standard method' for calculating housing numbers but also enables a contingency should the delivery of housing not come forward as expected. In addition, the identified supply will enable decisions to be made in selecting the most appropriate sites to meet the future housing need."

Taken together, these points lead the Council to add a further 8,804 houses to the estimate, leading to a grand total of 39,285 new houses needed over the 17 year period 2021 to 2038.

Finding the housing sites. This numerical process is the starting-point for the Council to search for land where these new houses can go. This table from the Plan summarises the numerical outcome of that extended and complex process. In the Council's view the necessary sites can be found from :

- Extant planning permissions 12,050
- Supply from unconsented allocations in the Local Plan 16,570
- Small sites (10 to 30 dwellings) + major unconsented sites 3,615

- Minor sites (9 dwellings or fewer) Windfall Allowance	6,193
- Sites identified in neighbourhood plans	737
- Unconsented rural exception sites with funding	120
- Total Supply	39,285

This table shows that two-thirds of the sites needed to meet that total will have to come from land not now zoned or 'consented', including large areas of greenfield land, some of which is within the AONB or the Green Belt, which (as earlier quoted) the NPPF expressly says should not be so used.

The Council must think again. We object most strongly to this profligate approach, which disregards clear government advice, which will violate the AONB and the Green Belt, and which – as shown by the Sustainability Analysis which we summarise later in this response – will do other great damage to the landscape, to biodiversity and will impede the crucial process of mitigating climate change. We therefore call on the Council to think again; to recognise the exceptional circumstances which are in fact clearly stated in Section 1 of the Local Plan and which we summarise below; and to recalculate the need for housing growth by taking advantage of the provision in the NPPF to use an alternative approach.

Dorset's exceptional circumstances. We believe that the very issues that are stressed in Section 1 of the Plan provide a strong basis for a claim that Dorset indeed has exceptional circumstances which justify an alternative approach to assessing the need for housing growth. These circumstances are :

- the exceptionally rich heritage of the county in terms of landscape, natural habitats, geological features, historic towns & buildings and ancient monuments
- the wide range and exceptional overlapping density of global, European, national and local designations which protect that heritage and which are shown in Figure 1.2 of the draft Plan
- the Green Belt around the west side of the BCP conurbation, which provides a 'green lung' for a large population of South East Dorset and of the conurbation itself
- the congestion of traffic in Central and South East Dorset, and other severe pressures on the infrastructure of those areas.

The Government's intentions related to the Green Belt are made very plain in Paras.136-137 of the National Planning Policy Framework :

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."

Alternative calculation of housing need. The re-calculation of housing need that we urge upon the Council should focus on the need which arises mainly within the county and which can be met within the assessed capacity of the county in terms of environmental constraints and the practicable increase in supporting infrastructure and services. We do not have the information needed to do a precise alternative calculation. But we note from government advice the three key elements which are typically used in calculating housing need, namely :

- Household projections – the number of new households that may be formed over the Plan period
- Affordability ratios – that is the price of houses compared with average incomes, which (by laws of supply and demand) may lead to deliberate over-provision of houses in order to depress prices to more affordable levels
- Unmet need from neighbouring areas.

Our observations. With these elements as starting-points, we note that :

- Taken in the round, during the period 2011 to 2018, the number of dwellings in the Dorset Council area increased by an average of 1070 dwellings per year ** This is a straight indication of net growth in households : there is no reason to suppose that the growth will accelerate, indeed nationally the pace of household formation has been falling.

***MHCLG data quoted in report "Dorset Housing Need Evidence 2020", prepared for Dorset CPRE by Opinion Research Surveys*

- The affordability element has been taken (in the standard method of calculating housing need) to imply for Dorset that the basic household growth figure be multiplied by 1.38 to reflect high house prices and the consequent need to build more houses in order to bring prices down. However, at a time of low interest rates and the rising desire of people to retire into the county or to find second homes here, there is no reason to suppose that building more houses will lower the price of houses
- The unmet need from neighbouring areas is an unknown quantity, since BCP Council – the most likely source of that unmet need – has made no formal request to Dorset Council for help in that regard. No other adjoining planning authority has submitted such a request. Moreover, there is no obligation on Dorset Council to meet that need if requested. The ‘duty to co-operate’ in this respect was withdrawn in 2018 (<https://www.gov.uk/guidance/duty-to-cooperate>). Accordingly, we see no reason to widen the calculation of housing need beyond what applies strictly to Dorset Council area.
- As for the idea of a deliberate over-supply of housing sites in order to “enable decisions to be made in selecting the most appropriate sites to meet the future housing need”, that implies that the Council has not done its homework in identifying sites appropriate to identified needs, and would cause uncertainty all round about when sites are to be developed. We recognise the need to secure a supply of housing sites, and the pressure from Government to ensure delivery of target numbers of houses : but over-supply of housing sites will blunt the determination of landowners, developers, communities and the planning authority itself to use the most suitable land in a timely fashion. The planning authority can insist upon clearly indicated phasing of main development sites i order to bring forward development in a timely way.
- A further reason to avoid over-supply of land for development is that the Council intends to search for sites for possible new settlements (paras 2.6.40/41). If such sites are found, and adopted in future reviews of the Local Plan, they should not have to compete with a significant pool of zoned but undeveloped land elsewhere.

A reasonable figure. On the basis of these comments, we believe that a recalculation would point towards a total housing need of between 20,000 and maximum 25,000 over the period to 2038. Referring back to the table offered in the Local Plan, this total could largely be accommodated within land with extant planning permissions, small sites, minor sites, windfall allowance, sites identified in neighbourhood plans and rural exceptions sites. Some further land might be needed, but it should be possible to avoid breaching the Green Belt, making serious incursions on the AONB or building a massive estate north of Dorchester.

How much new workspace ? The other main driver of built development, as stated in the Local Plan, is the need for new workspace. The Plan states that :

“The requirement for employment land in Dorset has been derived from a workspace strategy. Economic forecasts suggest that around 21,000 new FTE (full time equivalent) jobs could be generated across the local plan area between 2018 and 2038. This gives rise to a need for between 131 and 151 hectares of employment land overall. Prior to the publication stage of the Dorset Council Local Plan, there will be a need to refresh the data used to inform the economic forecasts to take into account the economic impact of Brexit, the Covid-19 pandemic, and recent changes to planning rules.”

Our comment on workspace. We have no means of judging the accuracy or adequacy of the figures stated above. But we recognise the need throughout the county for the provision of workspace, and particularly of modern, well-equipped and flexible workspace suited to use for offices, laboratories, workshops or light industry. Job creation, including the spontaneous creation and expansion of small and medium-sized firms in the rural areas, is essential in order to enable people of working age to remain in their locality and to find work near their homes, thus reducing the need to travel.

We therefore welcome the proposals in the Local Plan for zoning of land for workspace development in many first and second-tier towns. The re-calculation of the numbers of new houses, which we urge the Council to undertake, may knock-on to affect the workspace needed. We note the intention to “refresh the data” on workspace needed to take into account the economic impact of Brexit, the Covid-19 pandemic, and recent changes to planning rules. We

urge that this should also consider the apparent rising desire among people in many professions to work full- or part-time from home, with what that implies for the design of new housing. When the “refreshment of data” has been completed, we trust that the outcome will be the subject of public consultation.

See further comment on delivery of workspace in the **Economy** Section

Knock-on effects of re-thinking. We accept that new housing and new workspace will be needed throughout the Plan period, but we have called for review and reduction of the housing numbers and we note that the workspace numbers are subject to review by the Council. These reviews will have knock-on effects throughout the amended Plan. They will mean that some proposed zoning can be deleted, not for NIMBY reasons but because it is truly beyond what this generation needs. That change will truly respond to the Dorset Council’s call (in Section 1) for “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.

Spatial strategy

The Plan then outlines a ‘spatial strategy for growth in Dorset’, by reference to a key set of factors, including the way that housing markets and economy differ and interact across the area, the environmental constraints, and the need to reduce the distance that people need to travel to work or to services. It notes that

“Successive studies have shown that there are two main housing market areas (HMAs) in Dorset, namely the Bournemouth/Poole HMA, centred on the conurbation and extending into eastern Dorset; and the Dorchester/Weymouth HMA, covering much of western Dorset. ... studies have shown that there are four functional areas covering Dorset. The northern part of Dorset is influenced by the Yeovil and Salisbury HMAs and that the more strategic A303 Corridor exerts a wider economic influence across the northern part of Dorset. In the far west of Dorset, studies also indicate a smaller, relatively self-contained HMA based on the Bridport/Lyme Regis/Beaminster area.”

So, the Plan identifies, as the basis for spatial distribution of development, four broad “functional areas” – West Dorset, North Dorset, Central Dorset and South East Dorset.

Excess pressure. We broadly agree with this pattern of functional areas. We agree that West Dorset and North Dorset, in view of their lack of large towns and their relatively poor communication systems, have both less need and less capacity for new development than Central or South East Dorset. But we point out that the proposal to concentrate much of the growth in Central and South East Dorset will pile further pressure on the infrastructure of areas already hard-pressed, and will conflict with the declared need and Government policy to protect areas of high environmental quality and the Green Belt. This is a prime reason for our call to recalculate the need for overall housing growth. The resulting gross reduction in numbers should primarily be used to ease that new pressure on those two areas, and to remove the need to breach the Green Belt.

Hierarchy of towns. The rest of Section 2 outlines how the Council proposes to locate the development of new houses and workspace between the four ‘functional areas’ and (within those areas) to the towns within a ‘Settlement Hierarchy which is focused on **Tier I Large built-up areas** and **Tier 2 Towns and other built-up settlements**. Tier 1 areas are perceived as having greater capacity to absorb new development within or adjoining their urban structure than do Tier 2 settlements; and this leads to significant proposals for greenfield-site development in Central and South East Dorset.

Impact of large new housing estates. We accept the broad logic of this set of functional areas and this hierarchy of settlements. But we point out that placing large chunks of new housing on the edge of an existing large town will inevitably mean that the residents of the new housing will place further pressure on the infrastructure and services of that town and will be forced into longer journeys for jobs and some services than those who live nearer the town centre. These impacts can be reduced by insistence by the planning authority upon provision of some local services within the housing development : but the creation of large peri-urban housing estates raises serious issues of long-term sustainability and resilience. By contrast, in smaller towns

and villages, small elements of new development – if rooted in true local need – can greatly assist the viability of these settlements.

Rebalancing the distribution of new housing. So, in the context of the recalculation of need for housing growth that we call for, we would wish to see much less reliance on peri-urban housing estates; much stronger insistence on the provision of local services within such estates; vigorous use of Section 106 agreements and Community Infrastructure Levies to ensure that the developers of new housing contribute to the costs of meeting increased pressures upon infrastructure; and clear encouragement of limited locally-rooted growth in smaller towns and villages.

New housing in villages. We welcome the provision for development (Policy DEV6) in villages with development boundaries in rural Dorset and (Policy DEV7) outside local plan and neighbourhood plan boundaries. We believe that the planning authority should be open to, and actively encouraging of, the provision of affordable housing wherever there is palpable need for it in villages. We urge Dorset Council to be ready, where a parish council or others bring forward proof of truly locally-rooted need for housing in a village, to offer support in persuading a landowner in the village to release appropriate land for the creation of the new housing to meet that need; to recognise that land as an exceptions site, carrying an affordable price for the land; and to encourage and permit a scheme of social or affordable rented or shared-equity houses which cannot be diverted into second homes or bought by outsiders. That is true local development, wanted by the community and helping local people or key local workers to be there, sustaining local services and the vitality of the community.

Neighbourhood plans. We welcome the emphasis at section 2.9 of the Plan upon the status of approved Neighbourhood Plans as part of the Development Plan for their area, and the statement that development – except in certain categories – will not be approved outside the development boundaries defined in these Plans. We are disturbed by evidence of development permitted outside those boundaries, for example a house at Loders in West Dorset. We urge the Council to accept the values of and provisions within existing Neighbourhood Plans, and to promote widespread use of the Localism Act, in order to stimulate the involvement of local people in visioning and shaping the future of their settlements and local assets.

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Section 3 Environment and Climate Change

This section includes a wide range of issues, including emphasis on the County's high environmental heritage; cross-reference to the Climate and Ecological Emergency Strategy; and description of the statutory measures that can be deployed by the planning authority to protect and enhance the environment.

Environmental protection. We welcome the broad thrust of this Section. We will wish to see vigorous use of the statutory measures for environmental protection; and the full use (within the development control process) of requirements that applications for significant development projects should be accompanied by Biodiversity Plans and Landscape and Visual Impact Assessments. We will expect the Council to honour the commitment, stated among Strategic Objectives in Section 2, that it will “ensure that all new development incorporates ecological net gain to help deliver the aspiration to reverse the current decline in protected species and habitats”.

Development Levies. The Plan should provide for the vigorous use of Section 106 agreements, Community Infrastructure Levies and Nitrate Sensitive Area levies, in order to enable the creation of supporting infrastructure and services related to all new developments and to achieve the 'Swim Dorset' aim of clean rivers and beaches which we suggested in our response to the Climate and Ecological Emergency Strategy.

Nature Recovery Zones. The Plan should give clear indication, in maps, of the territories where Dorset Council and its partner agencies (including the AONB Partnership) intend to create extended Nature Recovery Zones and wildlife corridors, river catchment management schemes and other measures to protect, extend and strengthen Dorset's network of high-nature-value sites during the Plan period. The spatial allocation for Nature Recovery land-use should be determined at the same time as land-use for housing and workspace, in line with the DasGupta Report and the Prime Minister's commitment to protect 30% of UK land for biodiversity by 2030.

Design of New buildings. We endorse the need to secure high quality and sustainability in the design of new buildings, with a particular focus on Adaptability and Resilience (page 99 of the Local Plan). We note that the Council proposes to ensure that new buildings are “highly energy efficient and that designs meet national standards as a minimum”. But current national standards do not achieve the net zero standards that are needed if the County is to meet the goals stated in the Dorset Climate Strategy, the national law (Climate Change Act 2008, s1, as amended) and the global imperative to restrict the increase in temperatures to no more than 1.5 degrees above pre-industrial levels.

The Foreword to the White Paper February 2017; the Future Homes Policy consultation (FHPC), paragraph 2.33, states : “At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.” FHPC paragraph 2.9 states that “the Government wishes to ensure that we have a planning system in place that ... supports our efforts to combat climate change and bring greenhouse gas emissions to net zero by 2050.”

Urgency of meeting high standards. At page 105 of the Local Plan, it is noted that “The Government has recently consulted on proposals to increase the energy efficiency of new homes through the Future Homes Standard : this will be achieved through building regulations and is scheduled to be introduced by 2025.” The prospect of four further years of new buildings at less than net Zero standards is very troubling. So, we also note that – following the 2019 Consultation on The Future Homes Standard (on changes to Part L and Part F of the Building Regulations for new dwellings) – the Ministerial decision included the following statement :

“We recognise that there is a need to provide local authorities with a renewed understanding of the role that Government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.” (our added emphasis)

Net zero standard. We therefore urge the Council, from April 2021 onwards, to secure net zero standards in all new buildings, perhaps working (as is suggested in the Council’s Climate Strategy) with other local planning authorities in the South West. The Council should insist on high carbon-negative, environmental and social standards in all new housing, with local greenspace and facilities so people can make a good life without travel far from home.

Historic buildings. We note the statement, at paragraph 3.10.8 of the Local Plan, that :

“The installation of solar panels or photovoltaics within the curtilage of a historic (listed) building may also be possible provided that these would not irreversibly damage the historic fabric of the building, and that the impact on the listed building, including views of the building, would be limited. The roofscape, together with the location and design of the panels, including choice of materials, colours, specification etc., will all have a bearing on the potential impact.”

However – since the commitment to achieve net zero emissions is an overarching imperative – we believe that historic buildings should not be exempted from the obligation to cut emissions. The flexibility stated above in relation to solar panels should be applied to other changes to listed buildings, or to buildings in Conservation Areas, which are needed to increase energy efficiency, such as double-glazing of windows.

Pre-application processes. We urge that the Council should provide for, and insist upon the use of, pre-application processes for all significant development schemes, in order to knock out bad ideas, to ensure high design standards and to reduce the risk of permitting unsound development projects because the Council wishes to avoid the costs of expensive and time-consuming appeals. For major schemes, the Council should either prepare a planning brief in order to make plain to landowner and developer what it expects in the scheme, or work closely with the developer in preparing and agreeing a master plan before any detailed plans. For these purposes, the Council should appoint sufficient skilled planning staff to handle such pre-application processes.

Sustainability Assessments

We note from the 505 tables devoted to Sustainability Assessments of policies and site-specific proposals that the Council has conducted an extensive process of exploration and assessment of options. We further note that this process of assessment has been taken into account in whittling down a wide range of optional development sites to a short list which are presented by the Council as final proposals ... with exceptions only for three towns where the public is invited to choose between possible sites.

We welcome this work by the Council, but we point out that the public has not been involved in the process; -that the data is only available by diligent searching; and that it is presented in a .pdf format which makes it impossible to use directly in further comparative analysis. We wished to understand what the assessments showed about the estimated impact of policies and potential developments upon key factors including - crucially from our standpoint - biodiversity, climate change and landscape. Our expert member David Brown from Shaftesbury applied computational analysis techniques to prepare a clear and concise overview of the sustainability assessment data, expressed in the two diagrams below.

Overview. Figure 1 embraces data from all 505 tables and shows the assessment related first (on the left side) to policies in the Topics Section (volume 1) of the Local Plan, and to all optional development sites covered in the Sustainability Assessment.

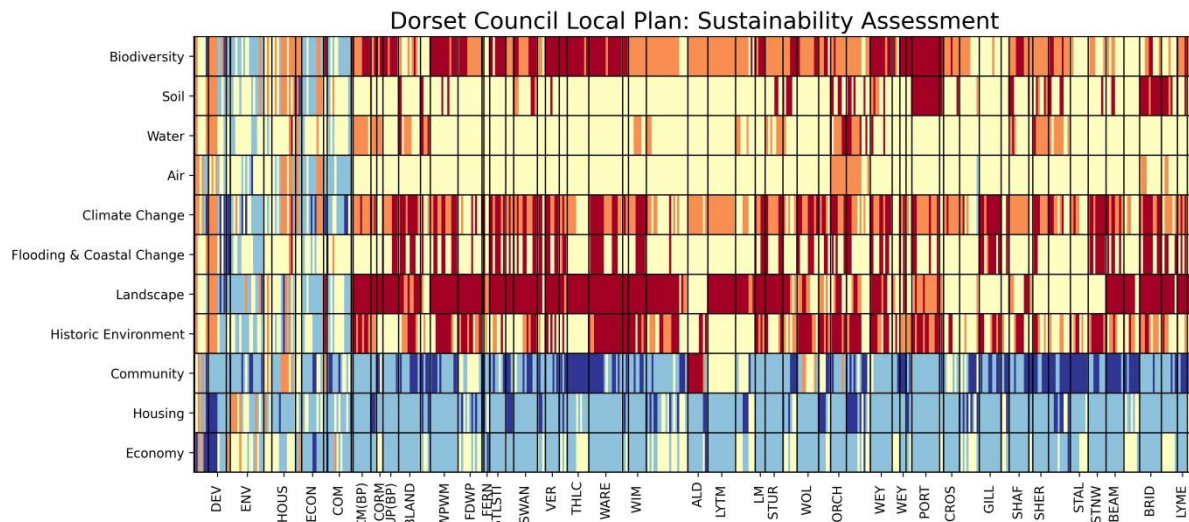


Figure 1 - Overview. Although not all 505 items in the Local Plan are labelled, they are all displayed. Shorthand codes at the bottom label some groups of related items. Groups are separated by black gridlines. Rankings from Dark Blue, Light Blue, Yellow, Orange, Red indicate Very Good, Good, Neutral, Bad, Very Bad impacts.

Adverse impacts. Figure 1 shows that :

- Most of the policies were judged to have either good or neutral impact on all the factors shown in the left-hand column
- Almost all of the optional development sites would have very good or good effects in strengthening communities; good effect in meeting housing needs; and good or neutral effect in terms of the economy
- Most of the optional development sites would have neutral impact on soil, water and air, but neutral or bad impact on alleviation of flooding or mitigation of climate change, and bad or very bad impacts on biodiversity and landscape.

Proposed sites. Figure 2 below is focused only on development sites which the Council included in Volume 2 of the Plan, i.e. those selected by the Council to be firm proposals, or (in three towns) offered as choices.

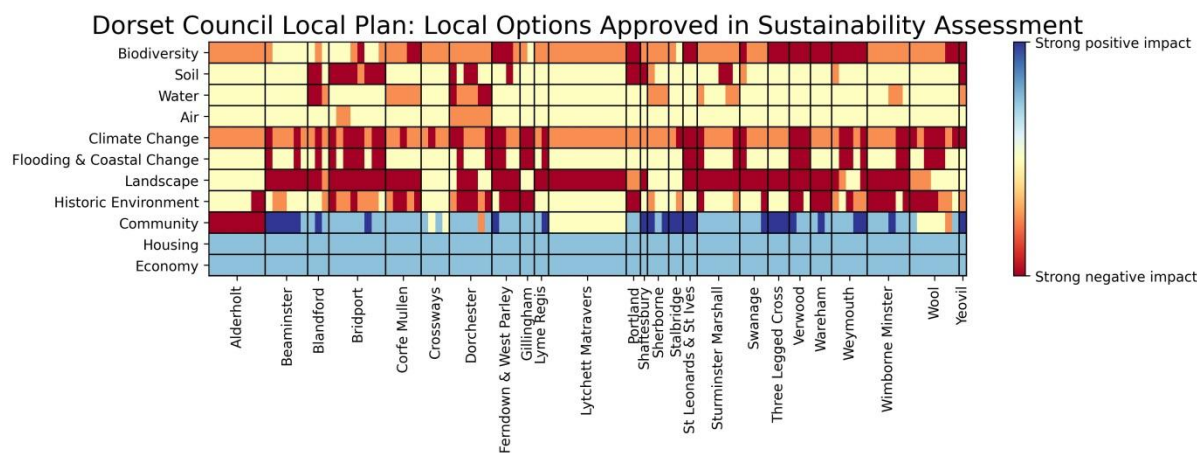


Figure 2 – Approved Options. The width of the block for each area (presented in alphabetical order) indicates the number of approved options in the assessment. As above, rankings from Dark Blue, Light Blue, Yellow, Orange, Red indicate Very Good, Good, Neutral, Bad, Very Bad impacts.

Remaining adverse impacts. Figure 2 shows that :

- All of the proposed development sites are judged to have good effects in meeting housing needs; and in strengthening the economy
- Most would have good or very good effect in strengthening their communities
- None would have better than neutral effects on any of the other indicators
- Most would have bad or very bad impact on biodiversity

- Most would have very bad impact on landscape
- All would have bad or very bad impact on efforts to mitigate climate change.

Proof of incompatibility. Despite these serious negative appraisals, these are the sites that are brought forward by the Council for further housing or workspace. This analysis shows exactly why we are urging the Council to think again. It shows that provision of housing and workspace on the scale proposed in the Local Plan is incompatible with statutory protection of designated landscapes, protection of biodiversity and with the Council's own commitment to tackling climate. It also shows that the Council would not be able to honour the commitment, stated among Strategic Objectives in Section 2, to "ensure that all new development incorporates ecological net gain to help deliver the aspiration to reverse the current decline in protected species and habitats". This incompatibility, and this lack of net gain, are prime reasons why the Council should take advantage of the provision in the National Planning Policy Framework and work on an alternative to the standard method of calculating housing need.

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Section 4 Housing

This section states proposals to ensure the supply of homes is of the right type for those who wish to live in Dorset. It refers to two Strategic Priorities

Suitable Housing. We will work with the development industry, town and parish councils, registered housing providers, community land trusts and local housing partners to deliver housing, including affordable housing, that meets the needs of Dorset. We want to enable those who grow up in Dorset to stay in Dorset.

Strong, healthy communities. We will work to build and maintain strong communities where people get the best start and lead fulfilling lives.

We would add a third strategic priority :

“Contribution to combat Climate Change and to strengthen biodiversity. We will work to ensure that all new housing is energy-efficient, designed to be carbon negative so that it is compatible with the imperative to eliminate net greenhouse gas emissions, to ensure resilience in the face of climate change and to produce net gain in biodiversity.”

Planning for resilience. The Council’s Climate and Ecological Emergency Strategy provides for mainstreaming of climate resilience in future strategies and policies. As planning authority, the Dorset Council should ensure that all new housing and other buildings or structures are resilient in the face of climate change and other predictable forces; and that they contribute to the wider aims of the strategy, notably those related to resources and natural assets. To this end, the Local Plan and the development control process should :

- point new development *towards* sites which offer durability and long-term value; and *away from* sites, such as floodplains, coastal lands which are subject to long-term erosion or sites of high value for nature conservation or carbon sequestration, which should not be used for built development
- promote – in new development – the choice of aspect, layout and vegetation which maximises the direct use of the energy of the sun, and which retains and extends natural features such as woodlands, hedgerows, green spaces, streams and ponds
- insist upon high social and environmental standards
- encourage, and where possible require under building regulations, the production and use of renewable energy, for example through installation of heat pumps or of a linked array of solar panels on the roof of a row of older houses during retrofit or of new houses or other buildings, and through provision of electric vehicle charge points
- for new developments of significant size, explore the potential for community-wide heating and energy generation, in preference to separate installation on each dwelling or other building
- promote the use, in construction, of bio-based materials which have low embodied energy and which lock-in carbon, such as timber, rammed earth and straw; and generally prioritise the use of materials that contribute to a circular economy –see further comment in the section on Economy. The Council should consider setting an embodied carbon maximum threshold per building, or per inhabitant or user for non-domestic buildings.

Housing mix. We endorse the proposal (Policy HOUS1) that new residential development of all tenures should contribute towards achieving sustainable and balanced communities through an appropriate mix of homes of different sizes, types and affordability ... though with the proviso that schemes focussed only on affordable housing (see comment in the next section below) may be partly exempt from that principle. In particular, we are keen to ensure that older people can be enabled, as their need for and capacity to maintain larger houses and gardens wanes, to move into smaller dwellings suited to their needs and near to the services on which they depend. Conversely, we wish to see younger families enabled to find dwellings which can be adapted or extended as the children grow or as the families’ working regimes change. These and other purposes related to housing mix may also be pursued by changes to existing buildings.

Affordable Housing. We welcome the substantial discussion on affordable housing. We regret the absence of any statement about the actual rolling levels of need for affordable housing in different areas, with breakdown into types of affordable housing needed. In the absence of such indicators, it is impossible to judge whether the quotas proposed are adequate or the split

between types of affordable housing is appropriate. We urge the Council (as both planning and housing authority) to :

- establish sharp, ongoing analysis of the need for and supply of all categories of affordable homes, on a whole-county and an area basis
- insist upon affordable housing quotas in all housing development, of a size and with such split between types of affordable housing as is appropriate to the recorded local need
- promote direct action by housing associations – and where necessary by the Council itself – to create ‘affordable housing only’ schemes where there is clear urgent shortfall in supply
- be ready to support exceptions sites in order to meet localised need for affordable homes, particularly in villages
- enable parish councils or community land trust to handle local allocation of social housing.

In this action, full account must be taken not only of affordability defined as a percentage of local market rents or values, but also of the income levels of those who need the houses. For many people on low income, 20% or even 40% less than market rents or prices may still be unaffordable in real terms.

Second homes. We are very concerned to see, from the map at Figure 4.4, significant areas within the county, mainly along the coast but also in certain inland rural areas, that have proportions of second homes as high as between 5 and 26%. Our members are aware, from direct experience, of the impacts of second homes on host communities as described at section 4.7.2 of the Plan. We believe those impacts are, in general, more negative than positive, by reference particularly to pushing up house prices and depressing the social vitality of the host communities. We think it likely that, in the wake of Covid-19, demand for second homes in the county will grow and will have further adverse impact unless deliberately discouraged.

Tax on second homes. We are persuaded by the argument (outlined in the Local Plan) that a “principal residency” policy, as applied for example in St Ives, may not be appropriate in Dorset in view of the wide dispersal of second homes in the county and the fact that few new homes (to which such a policy would apply) are likely to be built in places most popular for second homes. We therefore urge the Council to consider the use of higher council tax rates, applied as a disincentive throughout the County in order to avoid displacement of second-home demand from some areas to others. The yield from this tax might be used partly to cover the cost of tracking and checking the second homes the surplus yield might be hypothecated for use in subsidising or directly funding the provision of affordable housing in those communities with highest numbers of second homes

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Section 5. Economy

The introduction to this section states that

“A prosperous local economy is vital to achieving the strategic priorities of Dorset Council. The council’s Economic Growth Strategy sets out its ambitions to enable clean, inclusive, sustainable and good quality economic growth across the whole council area, and thereby bring improved standards of living, quality of life, health and wellbeing for all its residents.

“Delivering sustainable economic growth is fundamental to the future prosperity of Dorset and forms one of the strategic priorities of the local plan. The local plan can help deliver this sustainable economic growth by enabling development in the right locations, whilst minimising the impact of that activity through the protection and enhancement of Dorset’s unique environment.

“The economy and the environment are closely linked. The outstanding natural and historic environment of the local plan area contributes to the economy by making the area an attractive place to live, work and visit. ... The high quality of the coast and countryside, with its designated landscapes and heritage assets, is particularly valuable for tourism and attracting inward investment.

“Recent significant events such as the declaration of a climate and ecological emergency, Brexit and the Covid-19 pandemic have the potential to profoundly impact the local and wider economy. Although some effects are already becoming apparent there is much uncertainty and it is too early to tell how places and sectors will change as a result of these issues. Further work will be necessary to fully appreciate their implications for the economy.”

Link to the Climate Strategy. We endorse the statement above, notably the need for symbiosis and mutual benefit between the economy and Dorset’s high quality environment. This implies that land should not be newly zoned for employment within the AONB or the Green Belt. Moreover, we wish to see a strong reference to the implications of the Council’s Climate and Ecological Emergency Strategy, to the effect that :

- Development focused on economic growth and diversification should contribute to the imperative of achieving net zero greenhouse gas emissions and observe high environmental and social standards
- The essential processes of reducing greenhouse gas emissions, converting from fossil to renewable fuels, retrofitting existing buildings, enhancing wildlife habitats and other action to address the climate and ecological crises should be seen as a major opportunity to generate a green, local and circular economy and to generate a wide range of new jobs
- Management and enhancement of all aspects of the County’s natural, historic, architectural and scenic heritage and the nature recovery programme is already, and will continue to be, a significant source of employment
- There is much scope for sustainable use of the county’s natural resources, for example the potential for use of the County’s timber resources within the construction industry (see proposal later in this section).

The green economy. In our response to the Climate and Ecological Emergency Strategy, we suggested that Dorset Council should launch a **Regenerative Dorset** programme, aiming to transform its economy to be green, sustainable in use of resources, with a strong dimension of local self-sufficiency (notably in food) and of circular activity including use of local timber in new buildings. We therefore welcome the mention in the fully appreciate the implications for the economy of the declaration of a climate and ecological emergency, Brexit and the Covid-19 pandemic”.

Green Revolution. This further work should take account of recent announcements by Government, notably the

We look to Dorset Council, BCP Council and all relevant organisations to secure a good share for Dorset of the funds which the government is investing in the Green Revolution. As well as funding, all of the major four initiatives described above will require supportive policies in the Local Plan – which we stress in the sections on Environment, Housing, Transport and Energy.

Employment Land.

There is need throughout the county for the provision of workspace, and particularly of modern, well-equipped and flexible workspace suited to use for offices, laboratories and workshops or light industry. We therefore welcome the proposals in the Local Plan for zoning of land for workspace development in many first and second-tier towns. Rural areas in Dorset have been, and should remain, rich in small and medium-sized enterprises. At a time of fragility and increased unemployment caused by the pandemic, existing and new enterprises may need access to modern energy-efficient workspace, created either by retrofit of existing buildings or by new build, located close to public transport routes and serviced by high quality broadband connectivity and electric charge points. Stimulus to economic innovation can be provided by business 'hubs' containing shared workspaces and offering opportunities for skills training, ICT access, collaborative ventures and sharing ideas, initiatives and resources with links to investment.

Public investment. But zoning alone is not enough. A report prepared by the Rural Enterprise Group of Dorset LEP and submitted to the Dorset Shadow Unitary Authority showed that, of the 20 significant new workspace estates created in the county over the previous 20 years, all but two depended upon investment by public authorities in infrastructure or other elements. The report showed that much land previously zoned for employment had subsequently been switched to housing, on the alleged grounds of non-viability for creation of workspace, despite the clear demand for workspace. The report proposed that land zoned for workspace should be rigorously protected for that purpose; that the planning authority should work closely with the commercial sector to secure the development of workspace there; and that public funds if necessary be invested. We urge the Council to adopt that policy.

Town Centres

Redefinition and adaptation. We welcome the statement that vital and viable town centres are "at the heart of communities, providing accessible shops and services, employment and leisure facilities and helping to foster civic pride, promote local identity and contribute towards the aims of sustainable development". We recognise the serious challenge facing many town centres because of changes in retail trade, notable the massive growth in online purchasing. We therefore endorse the reference in the Plan (para 5.5.2) to "the need for town centres to be redefined and adapted to support a greater diversification of uses, including housing".

This is well reflected in the response to the Local Plan by Dorchester Town Council :

"The Town Council requests a fundamental rethink of the strategy for Dorchester Town Centre, using external professionals to work with the community to develop a coherent masterplan for the town centre area. Uses for the town centre space should include retail and hospitality, markets, leisure, and residential use."

Sustainability. In this context, our focus is on the contribution that town centres can make to enhancing quality of life while reducing greenhouse gas emissions, making good use of resources and reducing adverse impacts on wildlife. Town centres, if well served by public transport, can enable people to gain access to services without use of cars. They can be places for living as well as shopping and being entertained. Use of town centre sites, or of vacant floor-space (particularly on upper storeys) can provide housing without incursion on greenfield sites. Older people can particularly benefit from dwellings in town centres, very close to the services that they need. Dorset Council should work with town and parish councils and chambers of trade to clarify the potential for regeneration and the resourceful use of 'pocket sites' and unused floor-space in town centres for residential or other uses.

Farming and diversification

Transition within farming. The farming industry faces a major transition, over the next 10 years, in the nature of government support, following the cessation in the UK of the EU's Common Agricultural Policy. The regime of direct payments to farmers will be progressively replaced by 'public payments for public goods', deployed through the Environmental Land Management Scheme (currently in process of pilot projects and gradual introduction) and other supports such as grants for tree planting. There will be growing pressure on farmers to reduce

the use of fossil fuels and of inorganic inputs based on fossil fuels, to protect soil and reduce run-off of chemicals or other pollutants into water systems. Changes in popular diet, such as reduced demand for meat and milk, will prompt further changes. Farmers face market uncertainties because of Brexit and changes in international trade agreements.

Diversification. From our standpoint of concern for mitigating climate change and reversing the loss of wildlife, we strongly welcome these trends in farming. But we recognise the strains that are thus placed upon the farming industry, and – for that reason – we support the principle of diversification in the farming economy, for example through adding of value to farm products and the growth of farm-based tourism. So, we welcome the support offered in the Local Plan to diversification of farm enterprises.

A timber initiative. In our response to the Council’s Climate and Ecological Emergency Strategy, we urged the early launch of a research and development initiative focused on the potential of the county’s woodlands to produce timber for the purpose of buildings, furniture and other products. This could build on the experience of the many timber-using enterprises who meet each year at the Stock Gaylard Oak Fair; John Makepeace and the alumni of his former college at Parnham; the Architectural Association’s campus at Hooke; and the long-established Welsh Woodlands (Coed Cymru) initiative, with its skilful use of low-calibre hardwood. Such an initiative could bring useful secondary income to farmers and other woodland owners; create local employment; and enable builders to reduce the use of concrete and other building materials which have heavy loads of embedded energy. . In its section on building design, the Local Plan should support the use in new buildings of timber and other local low-embedded-energy materials such as rammed earth and straw.

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Section 6. Community Infrastructure

We welcome the emphasis on the role of community facilities in contributing to quality of life, healthy communities, economic growth and – crucially from our perspective – to promotion of local life with minimised need to travel and thus saving in use of energy and reduction of damaging emissions. We agree that social services should be protected, and should expand in step with the growth of communities.

Action by the Council. We welcome the statements that the Council will :

- deliver improved infrastructure across the whole of Dorset
- take actions to minimise the impact of climate change including minimising flood risk and to reduce the impact on the climate by locating and designing developments to reduce distances travelled and minimise energy use
- support renewable energy developments appropriate to Dorset
- ensure that all new development incorporates ecological net gain to help deliver the aspiration to reverse the current decline in protected species and habitats.

Infrastructure Delivery Plan. We welcome the Council's intention to produce an Infrastructure Delivery Plan (IDP) at the submission stage of the Local Plan, once future infrastructure needs become clearer through consultation. The IDP will identify the infrastructure and services needed to support the growth targets set out in the Local Plan, and how these can be funded. Planning obligations, commonly secured through section 106 agreements and the Community Infrastructure Levy, will be used to help in providing the infrastructure necessary to support new development. We note that the Council currently administers charging schedules for Community Infrastructure Levy introduced by its predecessor councils; and that it intends to adopt a new charging schedule for the whole county alongside the Local Plan in 2023.

Comment on Policy COM1. The policy should provide for transparency in the use of section 106 agreements and Community Infrastructure Levies. It should restrict the ability of developers to evade agreed responsibilities for the provision of community infrastructure aimed at net-zero accessibility, or from altering the agreed phasing. The policy should require developers to produce a viability assessment for the provision and maintenance of community infrastructure over the lifecycle of a development. It should include provision for monitoring the effectiveness of Section 106 agreements and Community Infrastructure Levies in terms of the agreed outcomes.

Local Community Buildings and Structures

We agree with the statements in the Plan that :

- community facilities contribute to the health, social, educational, spiritual, recreational and cultural wellbeing of the community
- the need for more such facilities is likely to arise through the plan period due to growth in homes and employment.
- facilities should be located within easy reach of those wishing to use them : this may be in town or local centres
- Where possible, facilities should be located on public transport routes and should avoid generating significant additional car based trips by facilitating opportunities for active travel, including pedestrian and cycle routes.

Links to public transport. We welcome the policy proposals at COM2. We agree that new development should be located on public-transport routes. But the Local Plan, in conjunction with a Transport Strategy, must ensure that such transport is provided over the lifecycle of any development. The aim should be to reduce automobile use, rather than to avoid “significant additional” trips. The current, inadequate ambition is one example of a general failure in the draft Local Plan to recognise the severity of the climate emergency.

Rural services. We are keen to see continuation and where possible strengthening of services in rural settlements. We therefore welcome the policy proposals at COM3. The need is to secure balance and mutual support between the main physical elements in our communities, in order to achieve quality of life and to enable people to find that life without having to travel far from home. Additional housing alone will not sustain the vitality of a town or village. People of

working age will only come to a place or stay in it if they have ready access to services and to jobs. We refer further to this in the Section on Economy.

The Transport Network

We welcome the recognition in the Plan that :

“Transport is the biggest carbon-emitting sector in Dorset, contributing around 40% of the total carbon emissions. Emissions from transport further contribute to poor air quality, and sedentary lifestyles are associated with rises in obesity, heart disease, diabetes and other chronic conditions.”

But we see the very short section 6.7 as a wholly inadequate answer to the great challenge of cutting this heavy contribution of transport to the greenhouse gas emissions that are causing climate change and threatening human health. The section is focused on land use and settlement solutions as distinct from transport itself.

Strategic vision needed. We call for a strategic vision for transport in Dorset, based on the principle that everyone should be able to access the facilities needed to lead to healthy, fulfilling lives without imposing intolerable burdens on future generations. The Plan must offer a bolder vision for the future of Dorset's towns and hinterlands and in particular a more ambitious, net-zero-carbon approach to accessibility-cum-transport, and carbon balance overall, taking into account the energy required for electric vehicles. It is only by linking development permissions at every stage with such a vision that truly 'sustainable' development can be expected from the Local Plan. It is not right to treat accessibility-cum-transport as a separate exercise once the parameters of spatial planning have been decided.

All new developments should be located and designed to generate zero emissions from surface transport and carbon balance overall, taking into account the energy required for electric vehicles. We also need a baseline for monitoring local greenhouse gas emissions. The Local Plan and all associated transport policies should be focused on the aim to drive transport-related CO₂ and noxious gas emissions to zero and reduce particulates and other pollutants to below safe levels. Despite the aims stated in Local Transport Plan 3 (2011–26), progress in reducing absolute levels has been minimal.

Transport Strategy. The Local Plan should be complemented by a Transport Strategy to drive delivery of more sustainable solutions. We need a more comprehensive, strategic plan for a public transport network to mitigate the climate emergency by radically reducing dependence on private vehicles; to enable access employment and learning and training opportunities for young people; to enable people to reach shops, pubs and restaurants; and to enable key-workers, patients and their visitors to attend hospitals and other healthcare appointments.

Transport hubs and spokes. The concept of eco-towns should be the model for Dorset's market and coastal towns, providing the Plan with a strategic objective from which accessibility needs and hence transport flows can be derived. Each eco-town should be a 'hub' connected to other hubs by high-quality public transport routes; while their hinterlands would be served by 'spokes' relying, as appropriate, on traditional public-, community-, and on-demand forms of transport.

School transport. One solution for providing public transport throughout the rural areas - would be to use the existing school transport network. During the middle of the day some buses and minibuses are simply laid up waiting for the afternoon pick-up from school. These vehicles could be used to increase the frequency, and possibly to extend the routes, of public bus services. Where there is space on school buses, parents and or carers might be enabled to travel at the same time as their children.

Sustained solutions. Location of development on an existing transport corridor does not deliver net-zero carbon transport on that route, and too often the planning authority has failed to address this issue adequately when negotiating with developers. 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.

Funding of non-car solutions. The role of developer contributions (Section 106 agreements and Community Infrastructure Levies) should be included in the policy and given strength to

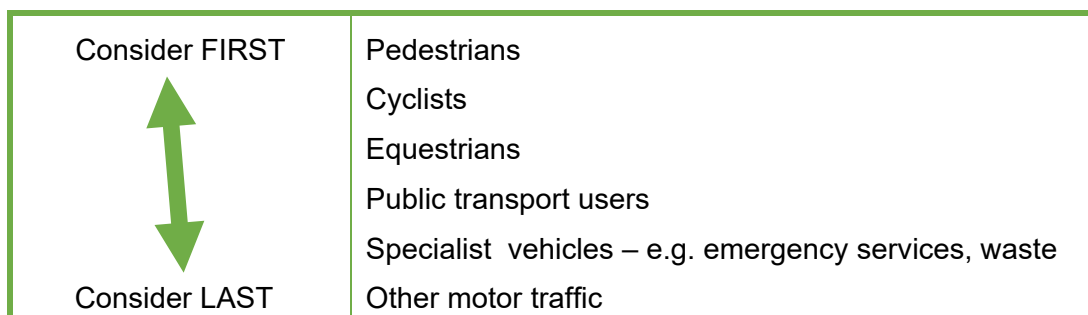
ensure that non-car transport solutions are required and delivered. Re-regulation of bus services, and/or the need for revenue support should be considered alongside this policy. There is much scope for developing and supporting innovative “on-demand” style minibus or community taxi services, community car-sharing schemes, and (further in the future) driverless transport facilities.

Walking and cycling. The Local Plan should place strong emphasis on the creation of both local and county-wide networks of safe walking routes and cycleways, in order to enable people to move safely on foot or bicycle within settlements and across the county. Dorset has a remarkable network of local footpaths and of middle- or long-distance trails which together comprise a major asset for access, recreation and tourism. But, in the towns, dedicated safe footpath networks are patchy at best : action is needed to fill the gaps in these networks, in both existing urban fabric and new areas of housing or other development. The same is true of urban cycleways, so that people may safely cycle to schools, shops and workplaces. As for longer cycleways, the pattern is even more patchy, and cyclists are obliged to risk their lives on many narrow, twisting or heavily trafficked roads. The need here is for a substantial effort of planning and finance, on the model set by Sustrans, in order to create a true county-wide network of cycleways, which would be a significant asset for residents and tourists.

A package of interventions. Research by the Royal Town Planning Institute demonstrates the need for a comprehensive package of interventions to reduce transport emissions. The RTPi advocates a place-based approach which prioritises measures reducing the need to travel, followed by those shifting trips to travel on foot or by bicycle, then public or 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. By contrast, a switch to cleaner fuels only accounts for just over half of the necessary GHG reductions, reinforcing the need for a ‘do everything’ approach.

Local Transport Plans. The Transport Strategy proposed earlier should be reflected in Local Transport Plans, giving the highest priority to zero carbon emissions alongside other economic, social and environmental objectives. As an example, we commend Purbeck Transport Action Group’s Purbeck Transport Strategy, which includes details of a thorough survey of local councils and other bodies and demonstrates considerable support for transport improvements. This type of local consultative strategy development should be applied across the whole of Dorset, making use of Transport Action Groups and other voluntary groups to assist with this process.

Traffic safety. Previous road accident statistics showed that the old Purbeck District Council area had one of the highest accident rates in the country. We urge Dorset Council to devise and implement a county-wide traffic safety plan. This should adopt the following road-user hierarchy contained in a previous Local Plan :



Transport conditions in development control. Dorset Council should the development control process to influence the transport policies of businesses and other organisations. For example, new or extended quarries should be required to transport aggregate by rail from the closest rail loading point, and if necessary contribute to upgrading rail freight access facilities, rather than accepting road transport as the default option.

Comment on Policy COM8. Control of parking is widely regarded as being a key to managing automobility. But, as worded, this is a ‘do nothing’ policy that fails to encourage non-car transport solutions. Parking must be set within an overarching Transport Strategy for Dorset.

The aim should be one vehicle per household as an upper limit within a development, through development of associated transport services. Indeed, developers should be free to propose plans with no parking included, provided transport needs are demonstrably catered for. This policy needs to link to policies on public car parks and on-street parking, to ensure that parking provision is coordinated and to guard against parking simply being displaced from development sites to other parking areas.

Driverless cars. We urge the Council to consider driverless cars and other autonomous vehicles in the Local Plan. Within the life of this Plan, driverless (electric) cars are expected to become available and are likely to become quickly widespread very. When that happens, private car ownership is expected to fall sharply as the convenience and high efficiency of a driverless car makes it unnecessary and undesirable to own your own. This will have major implications for transport in general including: parking, street scene, taxi, public transport, transport poverty and many other significant issues.

Comment on Policy COM9. The provision for electric vehicles needs to be strengthened. This is not just about providing parking places for electric cars. Their batteries are expected to become part of the balancing required for stability of the grid once it is converted primarily to renewable energy. Therefore the total number of spaces for electric cars, with charging points, should be increased. In the section about residential development, the current wording will result in few parking spaces with even fewer active charging points leading to considerable stress in the community. On the contrary, we need to make it attractive for residents to convert to electric cars. Every household should have access to 1 parking space with an active charging point whatever the size of the development. These should allow (at minimum) full charging overnight (8 hours). In non-residential developments, all parking spaces should provide basic charging facilities. We must move to a position where the assumption is that the car is electric : you either have a parking space with a charging point or no space at all !

Low carbon, decentralised and renewable energy schemes

Section 6.8 notes the need to increase the amount of energy produced from renewable resources. It states that “

“Currently in Dorset about 5.5% of the energy we use is from renewable energy sources. Locally generated renewable energy projects will be needed to increase this figure and to help meet the national net zero target. It is therefore important that opportunities are taken to generate renewable and low-carbon energy and create efficient energy networks through new development, for example by co-locating potential heat customers and suppliers, wherever this would be acceptable, and supporting community led initiatives.

“There is considerable potential to generate renewable energy from within the plan area. This is evident from the large number of renewable energy projects that have been granted planning permission in recent years, primarily in the form of large scale solar farm schemes.

“The high quality environment of the plan area is a major asset to the local economy but it also presents particular challenges in ensuring that renewable energy systems are sensitively located. Their individual or cumulative impact on the local environment, including the impact on the landscape character and rural amenity of the countryside or resident population will need to be considered, particularly in areas sensitive to change, and Environmental Impact Assessments (EIA) are likely to be required.

“Smaller-scale renewable energy proposals across the plan area are likely to be easier to integrate with the highly valued natural and built environment and will make an important contribution towards the target for installed capacity.

Central role of renewable energy. We believe that this section should state far more vigorously the central role of renewable energy in the future energy supplies of the County, since we must move away from fossil fuels. The Council’s Climate Strategy makes plain that this phasing out of fossil fuel must be matched by switching all uses of energy in the county to renewable sources. This will include, for example, heating homes and other buildings through heat pumps or hydrogen; powering transport through electric batteries or hydrogen; and deriving electricity from solar power, wind power or other renewable sources. At present, renewable sources produce about 480 MW each year, roughly 10% of Dorset’s energy needs.

The predictable total need for Dorset County and the BPC conurbation is about 8 GW, 16 times that current total.

We believe that this imperative towards renewable energy should be urgently reflected in the planning policies and actions of both Dorset Council and the BPC Council. We welcome the commitment by Dorset Council in the Climate Action Plan :

“to work with renewable energy developers to secure new renewable energy generation to meet and exceed the needs of the Council

“as local planning authority, to actively encourage renewable energy by identifying suitable areas in the local plan and creating guidance for developers

“to undertake detailed resource mapping to confirm Dorset has the technical resources to be self-sufficient, and to identify potential sites in the Local Plan

“to lobby central government over the major hurdles to renewable energy deployment, the Navitus Bay decision, investment needed on grid infrastructure and future of heat

“to work in partnership with BCP to plan a zero carbon energy system in Dorset.”

Potential sources of renewable energy. In our response to the Climate Strategy, we urged that high priority be given to the group of actions stated above, in order that the flow of renewable energy can be rapidly and radically increased. We see high potential for production of solar power on the roofs of existing and new buildings; for use of ground-source and air-source heat pumps; for community energy schemes; and (as technologies develop) for the use of hydrogen and nitrogen as sources of power. Renewable energy should be given higher importance in decisions about land-based installations, for example related to the impact of solar panels or even onshore wind turbines upon the county’s landscapes or to the installation of solar panels on the roofs of listed buildings.

Retrofit of existing buildings. In our response to the Climate Strategy, we urged that the Council should launch – in cooperation with town and parish councils, housing associations and other collective property owners – an urgent and sustained programme to update the energy efficiency of dwellings throughout the county, in order to save energy, cut greenhouse gas emissions, reduce costs for householders, tackle fuel poverty and increase health and well-being. This may involve actions - such as changes of internal layout, extensions, double-glazing of windows or installation of solar panels - that require planning approval. The Plan should provide for a supportive and flexible approach to such action, including area- or street-based activity such as solar streets or community energy schemes. This support should include advice from dedicated planning and conservation officers to the organisers of such schemes, to avoid individual householders asking the same questions of Dorset Council multiple times, thus creating unnecessary workload for the council and delays for those who wish to join the schemes. The retrofit programme should also extend to business and industrial premises, building upon the Government's energy efficiency target to reduce business and industrial energy consumption by 20% by 2030.

Community energy projects. We support the principle, stated in the Plan, that renewable energy projects are more likely to gain public support if there is community ownership of, or direct local benefit from, the installations. We are in favour of community energy projects, and would wish to see weight given to such projects in the process of planning control. The power sources for such schemes may include solar farms, small to medium scale wind turbines, geothermal energy and micro-hydro power. Any excess heat or electricity would be sold to the grid or other local users. Such schemes would have to be sensitively designed.

Renewable energy installations. We note, in the next section on ‘Wind Energy development’, the maps which (though virtually unreadable) appear to show sites potentially suited to larger-scale wind energy development. We welcome this as indication that the planning authority is willing to consider locations for wind turbines within the landscape, despite the government’s withdrawal of support for onshore development. But we note that the areas mapped only cover parts of the county; and that they do not show sites with potential also for solar arrays or micro hydro-electricity schemes.

Criteria for assessment. We suggest that the Local Plan should be filled out to include a clear statement of the criteria that the Council will apply in assessing proposals for renewable energy installations anywhere in the County. These criteria should strike a realistic modern balance

between (on the one hand) the high need to tackle climate change by reducing greenhouse gases and (on the other hand) the need to protect the county's landscape. We believe that the policy stated at COM10 should be modified to include (rather than exclude) large scale wind energy, and should recognise that landscapes can change to meet new pressing societal demands. Dorset should be ready to proudly display its commitment to move into the global era of renewable energy.

Offshore and coastal energy. We urge that the Plan be amended to express support for the revival of the proposal for an offshore wind farm in Poole Bay (Navitas). This could make a massive contribution to the switch to renewable energy. It could provide all the electricity needed by the households of Dorset, Bournemouth and Poole and (without subsidy) at lower cost than new fossil fuel or nuclear generation. Far from spoiling the view from the coast, the wind farm would give residents and visitors, especially the younger generation, hope for the future. There may also be potential for the exploration of marine-source heat pumps or sea-bed tidal power, consistent with a busy seaway and with the World Heritage status of the Jurassic Coast.

Phasing out of fossil fuel. The corollary to the rapid development of renewable energy is the phasing out of fossil fuels, in order to cut greenhouse gas emissions. This applies not only to the use, but also the production of fossil fuels. The Local Plan should make plain the Council's opposition to new or expanded extraction of fossil fuel within the County. This should include opposition to any new exploration or extraction, by fracking or other means, of oil or gas, including the proposed oil drilling in Puddletown. There should be no expansion of the Wytch Farm project, which is the largest onshore oil field in Europe : plans should be established now for the phasing out of extraction and refinement from this oil field, with due planning for jobs to replace those that will be lost.

Waste incineration. We are strongly opposed to incineration of waste. It should not be seen as a source of renewable energy, because a large part of the waste that is typically incinerated is plastic, which is a fossil fuel derivative. Waste incinerators emit large volumes of carbon dioxide and of air-polluting particulates. Since they may have an operating life of 25 or more years, they create a long-lasting demand for waste over a period which should instead see a policy-driven reduction in the volumes of waste and the determined increase in recycling rather than burning. Specifically, we have added our voice to the opposition to the Portland Waste Incinerator; and we urge Dorset Council – both as waste authority and as planning authority – to turn its face against this project, which we believe to be wholly incompatible with the reductions in greenhouse gas emissions and in air pollution which the Council has embraced in its Climate and Ecological Emergency Strategy.

Dorset CAN Response to Dorset Local Plan 120321

Written by Michael Dower, with inputs from over 40 members of the Dorset Climate Action Network, notably including David Brown (analysis of Sustainability Assessments) and members of the Advocacy, Transport and Energy Teams of Dorset CAN. We drew on discussion at meetings with other organisations and on papers prepared by those bodies.

This policy statement and response to the Dorset Local Plan is supported by the following organisations :

Beaminster Area ECO Group – 135 members in 16 parishes

Beaminster ECO Church - 10 members representing the PCC of 17 and church congregation of 75 in Environmental matters

Chardstock Parish Council

Dorchester Churches Together Ecology Group – which has representatives from 7 churches and Hillfield Friary, each of which has an average of about 100 members

Dorset Climate Action Network – 500 members

East Dorset Friends of the Earth – about 150 local members.

Green Martinstown - 34 members

Greener Gillingham - 20 members

Planet Purbeck – 350 members

Planet Shaftesbury - 190 active subscribers.

Purbeck Energy Group, which is a sub-group of Sustainable Swanage and has representatives from Sustainable Swanage, Langton Planet Action, Corfe Castle Parish Council Environment Group, Arne Parish Council, Wareham Town Council, Plastic-Free Wareham and Stoborough Women's Institute.

Purbeck Transport Action Group, which consists of representatives of all the Parish and Town Councils in Purbeck, and of organisations including the Community Rail Partnership, National Trust and Sustrans.

Stop Portland Waste Incinerator

Threshold Centre Cohousing Community

Transition Town Bridport – 257 supporters

Transition Town Dorchester – about 50 supporters

Turn Lyme Green & Plastic Free Lyme Regis - 28 subscribing members & 460 supporters.

West Dorset Western Area Transport Action Group – 180 supporters

Worth Planet Action, Worth Matravers - 28 supporters

Zero Carbon Dorset - 350+ supporters

Individuals

Donna Curtis, Charmouth

Gabriel King

Fred Lindop, Swanage

Michael Lunt

Tony Meader

Adam Pearson

Kate Potter

Roger Seaman, Swanage

Sue Spilling & Dr Chris Spilling, Langton Matravers

Jessica Starmer, Corfe Castle

Bernard White, East Burton near Wool

Toby Wiggins, member of **Pan Purbeck Action Campaign**

Amy Wolff, member of Greener Gillingham

ENDS