

# Dorset Local Plan Campaign Alliance

## Open Letter to

Councillor Spencer Flower  
Leader  
Dorset Council,  
County Hall, Dorchester

17 January 2022

## Dear Cllr Flower

We are writing on the behalf of a group of 38 organisations representing more than 20,000 citizens of Dorset to urge your Council to Re-think the draft Dorset Local Plan.

We recognise the high importance of a Local Plan as the basis for delivering development which meets the needs of current and future generations. We acknowledge the great effort that has gone into preparing the draft Local Plan and the public consultation. We also commend your Council's admirable drive towards net zero carbon emissions and strengthening of wildlife through the Climate and Ecological Emergency Strategy, and your success in securing government funding to reduce your Council's own carbon footprint and to launch action more widely in the County.

However, we note that many respondents are opposed to the Local Plan. Strong reservations were also expressed by public bodies, notably Historic England and Natural England. 91 per cent of those represented in the public consultation rejected the development strategy at the heart of the Plan. Instead, we suggest ways to transform the Local Plan into a visionary programme that enriches the county and serves the people of Dorset – especially the young and those most in need.

We believe that the draft Local Plan:

- Would do great harm to Dorset, through adverse impact on its natural environment, landscape and historical character
- Falls short of meeting the needs of Dorset's population by providing the right houses in the right place at the right price
- Fails to face up to the global challenges of climate change and reversing the loss of wildlife.

Specifically, we contend that the Draft Local Plan:

- Is incompatible with the Climate and Ecological Emergency Strategy, and the scale and pattern of development proposed in the Local Plan will gravely undermine the pursuit of that Strategy
- Greatly overstates the number of new dwellings that should be built in the County between now and 2038, while failing to provide for the genuinely affordable homes which Dorset needs

- Proposes excessive and unjustified intrusion on the Green Belt, the Area of Outstanding Natural Beauty and other locally valued greenfield land, all of which are (to varying degrees) protected in the National Planning Policy Framework
- Will seriously damage the landscape, heritage and wildlife of the County, as shown by your Council's own Sustainability Analysis
- Contravenes your Council's drive towards net zero carbon emissions and reversal of the loss of wildlife, because the proposals in the Plan would greatly increase the impact of built development and transport and the pressure on all forms of infrastructure.

For all these reasons, we believe there is a strong case to radically Re-think the Draft Local Plan and the Development Strategy which underlies it. We remind the Council that they have until April 2024 before the new Local Plan needs to be adopted; and that they can prevent uncontrolled development by ensuring a five-year housing supply separately from the new Local Plan.

The Annex to this letter sets out in more detail why we disagree with the current draft Local Plan and the changes that we would like to see made to it.

We are ready to work with Dorset Council to explore how these ideas can be reflected in the Dorset Local Plan and the Climate and Ecological Emergency Strategy. The Press and local voters are likely to respond positively to the preservation of the County's natural assets, opportunities for affordable housing, reduced energy bills and increased job opportunities in the green sector. We ask for the opportunity to meet you and the portfolio holders for planning and the climate strategy so that we may discuss how this can be achieved. We look forward to hearing from you.

This Open Letter is copied to all Dorset Councillors; Chief Executive Dorset Council; Dorset Council Planning Department; all Town and Parish Councils; and all partners in the Campaign Alliance. We are also sending a Press Release to all Press and TV Networks.

Yours sincerely,

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Cllr Chris Walker, Action for Alderholt

Edwin Macknamara, Arne Parish Council

Alyson Black, Beaminster Area ECO Group

Julie Leah, Charmouth Green Group

Carol Byrom, Cheselbourne Parish Council

Henry Lovegrove, Corscombe, Halstock and District Parish Council

Martin Price, Friends of the Earth East Dorset

Scott Morrison, Friends of the Earth West Dorset

Colin Tracy, Green Martinstown

Brother Hugh, Hilfield Friary

Mike Allen, Just a Good Village, Sturminster Marshall

John Goddard, Keep Corfe Mullen Green  
Keep Stur Course, Sturminster  
Bernard White, Group of Wool Households  
Collette Drayson, Langton Planet Action  
Lytchett Matravers Parish Council  
Deirdre Flegg, "Lytchett Matravers: The Dorset Local Plan" Facebook Group  
Rob Waitt, Planet Purbeck  
Rachel Bodle, Planet Shaftesbury  
Paula van Breda, Planet Wimborne  
Julie Booker, Portland 4 The Planet  
Nick Ward, Purbeck Transport Action Group  
Jane Ashdown, STAND (Save the Area North of Dorchester)  
Sarah Pattison, Stinsford Parish Council  
Paula Klaentschi, Stop Portland Waste Incinerator  
Dr Lesley Haskins, the Erica Trust  
Threshold Centre Co-housing Community, Gillingham  
Sam Wilberforce, Transition Town Bridport  
Kate Forrester, Transition Town Dorchester  
Rachel Palmer, Trees for Dorset  
Stephen Harper, University and College Union of Bournemouth University  
Billy Shearer, Western Area Transport Action Group  
Alison Francis, Wimborne Minster Environment Group  
Rachel Palmer, Wool Flora and Fauna  
Caz Dennett, XR Dorset  
Melissa Carrington, XR Bournemouth, Christchurch and Poole  
Mark Chivers, Zero Carbon Dorset

The list below shows the number of people represented by each Campaign Alliance partner:

- Dorset Climate Action Network, 125 individual members, 25 member organisations, 2000 supporters
- Action for Alderholt, 1000 signed the petition
- Arne Parish Council, 8 members representing population of 1300
- Beaminster Area ECO Group, 135 members in 10 parishes
- Charmouth Green Group, 129 members
- Cheselbourne Parish Council, 280 parish residents
- Corscombe, Halstock and District Parish Council, 1,190 population must
- Friends of the Earth East Dorset, 167 members
- Friends of the Earth West Dorset, 10 members
- Green Martinstown, 60 members or supporters
- Group of Wool Households, 12 members
- Hilfield Friary, 27 members
- Just a good village, 236 members
- Keep Corfe Mullen Green, 31 members on Face Book
- Keep Stur Course, Sturminster Newton, 123 members
- Langton Planet Action, 20 members
- Lytchett Matravers Parish Council, 3,800 parishioners
- Lytchett Matravers Facebook, 300 subscribers
- Planet Purbeck, 1500 supporters
- Planet Shaftesbury, 175 active participants

- Planet Wimborne, 68 individuals and 10 associated groups
- Portland 4 The Planet, 814 members or supporters
- Purbeck Transport Action Group (PTAG) representing c. 30 organisations
- STAND (Save the Area North of Dorchester), 5,000 people signed the petition
- Stinsford Parish Council, 320 residents
- Stop Portland Waste Incinerator
- The Erica Trust, 3 Trustees
- Threshold Centre Co-housing Community, Gillingham, 15 households
- Transition Town Bridport, 110 supporters
- Trees for Dorset, 80 members
- University and College Union of Bournemouth University, 400 members
- Wimborne Minster Environment Group, 8 members
- XR Dorset, 500 members
- XR Bournemouth, Christchurch and Poole, 35 members
- Zero Carbon Dorset, 194 newsletter subscribers + 550 social media followers

**Total at 14 January 2022:**      **38 organisations**  
   **20,690 individual members, supporters or parishioners**  
   **65 affiliated groups**

**See Annex the Open Letter, starting on the next page**

## **Annex to the Open Letter to Dorset Council from the Dorset Plan Campaign Alliance**

In this Annex, we highlight the key areas where we regard the draft Local Plan as not fit for purpose and where we urge Dorset Council to revise it.

### **Why do we oppose the plan ?**

#### **1. Severe Risk of Harm to the County**

1.1 Environmental Capacity. The Plan proposes the construction in Dorset County, between 2022 and 2038, of more than 39,285 dwellings, plus associated workspace, infrastructure and services. We believe that this scale of development is beyond the environmental capacity of the County, and that many of the proposed locations for new housing, shown in the Development Strategy, will do grave damage to the environment and character of the County. To justify such a high number of dwellings, the Council must demonstrate that this is compatible with the targets in its Climate and Ecological Emergency Strategy and with the new Environment Act.

1.2 Protected areas. The Plan proposes significant encroachment upon the Green Belt, the Area of Outstanding Natural Beauty, and other locally valued greenfield land, all of which are (to varying degrees) protected in the National Planning Policy Framework (NPPF) and supporting Guidance. Analysis of the housing zones proposed in the draft Local Plan shows that 92% of all proposed dwellings are located on greenfield sites, 13% are within the AONB and 14% are in the Green Belt. Indeed, within South East Dorset, 47% of proposed houses are located on Green Belt Land. As the Dorset Heathlands Supplementary Planning Document (SPD) identifies, any development in the south-east of the County will have adverse effects on Dorset Heathlands.

1.3 Pressure on infrastructure. The development proposed – and particularly the large new housing estates on greenfield sites – would place heavy pressure upon the existing infrastructure and services of the County, in terms of roads and other transport infrastructure, water supply, sewerage, electricity, telecommunications, health and social services and other services. Much of the infrastructure is already overloaded: for example, limits on sewage capacity are already forcing discharges of untreated sewage into waters used for recreation. Expansion of this infrastructure, on the scale proposed, would do further damage to the county.

#### **2. Does not Well Serve the People of Dorset**

2.1 Affordable Housing. The draft Local Plan includes significant provision for affordable housing, to be provided mainly through quotas on open-market housing. However, this

system depends heavily upon the willingness of private developers to honour those quotas. In practice, some new developments lack the required quotas of affordable houses, because developers successfully claim that the development would not be financially viable. Moreover, so-called affordable housing is often not affordable to people on low income, as shown by the high numbers on the waiting lists for social housing.

2.2 Social Housing. The draft Local Plan does very little to alleviate the need for social housing. At the end of March 2020, government statistics show that 5,536 households were on Dorset’s housing register. At the current rate of building a few hundred social dwellings each year, it would take 20 years to clear the backlog : moreover, new demands will almost certainly arise.

2.3 Housing Location. In the draft Plan, many developments are not located where local people need them – close to jobs, amenities and services, either in towns or in villages which need the population to sustain those services. Development on greenfield sites away from town centres tends to favour people from outside Dorset rather than the local population, and demands heavy investment in new basic infrastructure.

### **3. Incompatibility with the Climate and Ecological Emergency Strategy**

3.1 The global imperative. Many of the proposals in the Plan are incompatible with the aspirations stated in the Climate and Ecological Emergency Strategy adopted by Dorset Council in July 2021. The Strategy recognises the global imperative of cutting greenhouse gas emissions and reversing the loss of wildlife; and sets out targets and policies to meet that imperative. Action has started on the Council’s own land and is moving towards widespread activity by other stakeholders. This action will be undermined, and made enormously more challenging, if development on the scale proposed in the Plan proceeds. Every house, every workspace, every mile of new road will add to greenhouse gas emissions and may threaten our landscape and wildlife heritage.

3.2 Impact on environmental resources. Analysis of the Sustainability Assessment conducted by Dorset Council shows that development of most of the zones proposed for housing in the Plan would have harmful or very harmful impact on biodiversity, most would have very harmful impact on landscape and all would have harmful or very harmful impact on efforts to mitigate climate change.

3.3 Responses from government agencies. Responses from Historic England and Natural England show their grave concern about the potential impact of the development strategy upon the environmental resources of the County. We endorse a key statement by Natural England that Dorset Council needs to ensure “substantive steps are taken through the provisions of the local plan to tackle the emergencies identified by securing appropriate reductions in carbon emissions and the large scale restoration of biodiversity”. To achieve

this, they state that “It is likely that the local plan will need to be essentially an environment plan at its core that ensures the delivery of sustainable development, rather than one whose primary focus is simply the delivery of housing numbers.”

### **What changes do we seek ?**

We urge Dorset Council to Re-think the Local Plan by making the following changes:

#### **4. Reduce the total number of proposed new dwellings in the Local Plan**

4.1 Provisions in the NPPF. The Council should take advantage of provisions in the National Planning Policy Framework (NPPF) to propose an alternative approach to the government’s standard method for calculating housing need and reduce the total number of new dwellings in the Local Plan to 22,000 over the 17-year period of the Plan. This new assessment of housing need can be justified by Dorset’s “exceptional circumstances”, based upon the exceptional quality of its natural, scenic, geological, historic and architectural heritage and the statutory protections applied to that heritage.

4.2 Respect the county’s capacity. The figure of 22,000 new dwellings is based on our assessment of the capacity of the County for new development in the Plan period, taking account of (a) the need to protect the Green Belt, the Area of Outstanding Natural Beauty or other locally valued greenfield land, (b) the existing pressures on infrastructure in many parts of the county, and (c) the need to avoid levels of development which would undermine the pursuit of targets set in the Climate and Ecological Emergency Strategy.

4.3 Deliverability. Delivery of 22,000 dwellings is also consistent with the average house-building rate in the county of 1,335 dwellings per year over the last 5 years. This suggests that this revised target is achievable and deliverable by house builders. This also alleviates the problem where over-promising on delivery rates is more likely to result in failing the Government’s housing delivery test, which could lead to uncontrolled development.

4.4 Challenge the ‘standard method’. The 22,000 figure also tallies with the scale of the estimated need for housing found by using the basic element in the Government’s standard method for calculating housing need. However, it does not include the “affordability ratio” uplift, which contains wholly unrealistic assumptions about the impact of new development on house prices. We do not believe that building a further large number of houses will reduce house prices to a level affordable by local people. We urge the Council to challenge those assumptions.

4.5 Refuse to accept unmet housing need from BCP. The 22,000 figure also makes no provision for meeting unmet housing need from Bournemouth, Christchurch and Poole. The NPPF permits planning authorities to refuse to take unmet needs from neighbouring



authorities if they do not have the capacity to do so. Dorset Council should use that permission in the NPPF, because the County does not have spare capacity to take any overspill from other planning authorities.

**4.6 Sustainable Locations.** With the lower figure of 22,000 new dwellings, it becomes possible to impose a strict limit on the scale of new housing developments on greenfield sites and avoid unnecessary building in Greenbelt, AONB and locally valued or environmentally sensitive locations.

## **5. Provide the right homes in the right place at the right price.**

**5.1 A stronger focus on local housing need.** We urge the Council to place a stronger focus on meeting the housing needs of existing residents of Dorset. This means addressing the needs of local people for truly affordable housing and reducing the long waiting list of people seeking social housing. We wish to see planning and housing policies which include enhanced action by housing associations, community land trusts and local authorities. This should be supported by freeing up local authority owned land, designating 'exceptions sites' in villages, and promoting shared-equity schemes to ensure that homes remain available to vulnerable local people in perpetuity.

**5.2 Net inward migration, second homes & holiday homes.** Population growth in Dorset is dominated by net inward migration with a modal age of over 60. This puts very heavy pressure on health services and diverts attention from younger people and job creation in Dorset. Moreover, there is a strong demand for second homes and holiday homes in Dorset, which contributes to higher housing prices. We urge Dorset Council to implement policies that encourage full-time residence in new properties and, where necessary and in consultation with local people, discourage second homes and holiday homes, for example through council tax increases.

**5.3 Housing in sustainable locations.** In choosing land for new housing, high emphasis should be placed on the aims of the Climate and Ecological Emergency Strategy. These aims imply the choice of locations which would minimise the impact upon open landscape and wildlife habitats; make effective use of existing infrastructure; increase the footfall for existing services; reduce the need for use of private transport; and stimulate use of public transport and 'active transport' such as walking and cycling. The county has a large population of elderly people, who need to be housed within close walking distance of good-quality services.

**5.4 Choice of land for new housing.** With the above criteria in mind, we urge that new zoning of land for housing should move away from greenfield sites and especially Green Belt land towards the following types of land:



- Re-use of empty houses or of buildings or sites, particularly those in or near the centre of towns, which have become redundant or vacated because of changes in the property market for retail, offices and other purposes
- Brownfield sites, unless these have high nature conservation or heritage value
- Sites near to town centres or to hubs of public transport systems, such as railway stations or main bus terminals : this would serve to promote sustainable transport
- Small developments of mainly affordable housing in villages and smaller towns, where there is registered housing need, in order to sustain the vitality of these settlements, especially where these are linked to the provision of local employment opportunities and local services.

The Plan should embrace, as a central principle, the concept of “place-shaping” (as proposed by the Committee on Climate Change), using its existing powers to promote energy efficiency, with a realisation that new development should be located with the primary aim of reducing the need to travel.

5.5 Housing Viability. Too often the provision – in new housing developments – of affordable housing, social facilities and high environmental standards is compromised by the housing viability test. We note the Government guidance that the price of building land should not be used by landowners or developers to justify failure to meet high standards of sustainability or quotas of affordable housing. Dorset Council should draw the attention of landowners and developers to that guidance; and should refuse planning permission for developments that do not meet these standards and quotas.

## **6. Use planning to implement the Climate and Ecological Emergency Strategy**

6.1 Strategic Intent. The Climate and Ecological Emergency Strategy, as adopted by Dorset Council in July 2021, demands a relentless drive towards net zero carbon emissions, the elimination of other greenhouse gas emissions, massive increase in production of renewable energy, and a renaissance of wildlife habitats and species after decades of damage and loss. This has major implications for the role of planning, which are not well reflected in the draft Local Plan. The Council should put the Climate and Ecological Emergency Strategy and the environment at the very heart of a revised Local Plan.

6.2 New buildings. The imperative to cut greenhouse gas emissions implies that all new housing should be highly energy-efficient, sustainable in the use of resources, and where possible accompanied by creation of renewable energy. At present, new houses are being constructed to building standards which will add to the County’s carbon footprint. These houses will themselves need expensive retrofit when net zero standards are fully introduced. Dorset Council should require all future buildings to have low-carbon heating systems and be built to the very highest energy efficiency standards that the government allows to be specified.

6.3 Retrofit of existing buildings. The Local Plan should provide for an urgent county-wide programme to retrofit existing housing and other occupied buildings in order to make them highly energy-efficient and thereby cut energy costs and increase comfort, particularly for people on low income. Such retrofit should be seen as ‘low-hanging fruit’, bringing large returns in the reduction of greenhouse gases at relatively low cost, while stimulating jobs in the local economy. The programme should include action to improve the energy efficiency of listed buildings or those within conservation areas, where consistent with the integrity of the buildings and their settings. The Council should press Government for the resources needed to achieve a county-wide retrofit programme.

6.4 Renewable energy. An urgent drive is needed towards production of locally-generated, community-led, renewable energy in Dorset. This has the benefits of reducing primary emissions and transmission losses and of benefiting local people financially. Renewable energy generation in Dorset should include a large increase in the deployment of solar PV panels and heat pumps on industrial, commercial, public and domestic buildings; and the construction of a limited number of PV solar farms and wind turbines, carefully sited to be as unobtrusive as possible in the Dorset landscape. Dorset Council should also press government and relevant energy agencies to boost the capacity of electrical infrastructure to accommodate the anticipated large increase in demand for electricity and in renewable energy generation.

6.5 True environmental benefit. The Plan should reflect a stronger commitment to measures which will protect the county’s heritage of soil, water and wildlife; reduce pollution of air, land and water; achieve true net environmental benefit from new developments; promote nature recovery in a widespread manner; and take account of the expected trends of climate change, for example towards greater risks of flooding, drought and storms. We fully endorse the response from Natural England which reiterates the need for “policies to facilitate and support the restoration and enhancement of Dorset’s wildlife. The clear aim should be for the implementation of the plan to significantly and demonstrably improve the environment, including air and water quality and wildlife interests during the plan period.”