



Dorset Council **Local Plan**



Development Strategy

2021 Consultation
Summary of Responses

January 2023



Dorset
Council

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1. The Strategy for sustainable growth

1.1. Introduction

Paragraph 2.1.1 - Sustainable Development

Town and Parish Councils

- Contests the definition of areas called ‘sustainable locations’ suitable for development.
- Intention to place ‘sustainable development’ at the heart of the document is welcomed.

Environmental groups (non-statutory)

- This definition of ‘sustainable’ in Section 2.1 does not reflect the climate and ecological crisis we find ourselves in. There is no sense of urgency in this section.

Cranborne Chase AONB

- There seems to be a fundamental flaw in the logic as the priority to deliver sustainable development which respects the area’s biodiversity and increases natural capital value is proposed to be done by delivering development.

Community groups (non-statutory)

- Sustainability needs to be re-defined taking account of recent changes such as home shopping deliveries, which help to reduce carbon emissions.

Public response

- Concerning that the definition of “sustainable development” is to meet the needs of people now and in the future, not the needs of the planet.
- The definition of sustainable development is skewed - building standards are not sustainable, and the LP does not insist on them being so.
- It is not clear how the Council is attempting to reconcile these conflicting objectives as DCLP only attempts to 'Green wash' an aggressive building programme.
- There is a lack of clear development management policies. Existing policies are not strong enough to prevent the vision being diluted and most of the rhetoric in the supporting text reads like an agent’s brochure.

Figure 2.1 - Sustainable Development Objectives

Town and Parish Councils

- Tensions between economic, social, and environmental objectives require appropriate management.
- The interdependence and interaction between the ‘Environmental’ and ‘Social’ issues is not recognised - separation affects the way subsequent policies are developed.

Cranborne Chase AONB

- Figure 2.1 - the minimal overlap between the objectives, and the extremely small elements where all three overlaps, misses the opportunity to not only reinforce national guidance but to demonstrate the practical challenges in Dorset of achieving these three objectives in mutually supportive ways.

Figure 2.1 - Economic Objective

Environmental groups (non-statutory)

- Wording of the Economic objective should be extended to include reference to a “green, circular and truly sustainable economy”.

Figure 2.1 - Social Objective

Environmental groups (non-statutory)

- Social Objective text should end with “...long-term community well-being and resilience.”

Figure 2.1 - Environmental Objective

Town and Parish Councils

- Environmental objective: The aim should be to prevent / reduce the extent of climate change, as well as mitigate and adapt.

Environmental groups (non-statutory)

- Use of words ‘protect’ and ‘enhance’ are important terms within the environmental objective of the plan.

Community groups (non-statutory)

- The reference to ‘mitigating and adapting to climate change’ reads as rather a passive statement.

Public response

- It states that the objectives of the climate change work are “mitigating and adapting” to its effect. The objective should go beyond this and should aim not just to contain Climate Change but to reverse it.

1.2. Vision

Approach to Vision

Dorset CCG

- Support for vision and strategic principles reflecting the importance of sustainable developments which promotes the commercial, economic, social, and environmental impacts of developments.

Town and Parish Councils

- Concern that the vision is vague and repetitive.
- The document lacks a strategy to achieve the vision.
- Unclear how the council plan (2020-2024) was formed and justification for its use in the vision.
- Vision and objectives are derived from government rather than Dorset.
- How will the vision be affected by the White Paper, “Planning for the Future”? - it suggests a threat to neighbourhood planning.

Environmental groups (non-statutory)

- The document lacks a strategy to achieve the vision - e.g. roadmap, milestones, etc.

Community groups (non-statutory)

- Support for vision, as it fully recognises the environmental quality of the County and emphasises the need to maintain and enhance its beauty, and respect the beauty, heritage and character of the landscape where development takes place.
- No vision of what we would like Dorset to be like in 20 years' time.

Developers/Landowners/Agents

- Vision and Strategic Priorities are generally appropriate. However, the Vision and Strategic Priorities must be consistent with one another and ordered appropriately.
- Support for Vision - encouraged by the Council's proactive approach in identifying opportunities for growth within the plan area.

Public response

- Vision needs to be coherent, optimistic, and inspirational, setting out where Dorset should be by 2038 (end of the Plan period).
- The plan should start with a 'vision' for Dorset - a Vision that has been consulted on and written by local communities.
- Local communities have many brilliant ideas on the vision for the future for Dorset - because of this top-down approach, this is being lost.
- No evidence of how the vision was developed, or how alternatives were considered.
- Suggested rewording of the section 2.1.5 with an overarching priority list.
- Vision is too general - not specific to the issues Dorset face, outlined within the introduction.
- Vision has no plans to improve transport, no coherent economic strategy for the County, no plans for deprivation areas apart from more houses, no infrastructure plans, spoiling green belt and adding to urban sprawl, does not build climate change into core assumptions so development is piecemeal.
- We need to concentrate on that which is human scale, walking and cycling as the main transport, local family retail shops, keeping the local economy inside the local economy and the wealth of our social capital.
- Would like to see a proactive approach where the Council provides leadership and direction to achieve its vision.
- Vision unsupported by policies but welcomes importance placed on housing provision, affordable housing, and climate change.
- Vision should be for towns that are car free, and there is good and affordable public transport between towns and rural areas.
- Issues the Council has identified should follow through the Plan and be used as a 'hook' in making the Vision specific to the area's needs.
- Vision fails to address the skewed age structure. Dorset is a retirement and tourism destination. Need provision for care and hospitalities sectors not over-emphasising new, higher paying sectors.
- Need for approach to education, transport, recreation sports, community facilities, telecoms infrastructure and renewable energy.

Dorset will be a great place to live, work and visit.

Developers/Landowners/Agents

- Dorset is already a great place to live, work and visit.

- Be more ambitious - amend Vision to say Dorset will be an ‘outstanding’ or ‘exceptional place to live, work etc.’.

The environmental quality of the area

Historic England

- Welcome vision and its many references to heritage.

Public response

- Vision fails to recognize the large number of protected areas in Dorset and the limited opportunity for development.

The settlements in Dorset all have their own distinct character

Cranborne Chase AONB

- Although ‘distinct character’ is mentioned there is no vision to retain character.

Town and Parish Councils

- The local plan does not have a clear overall vision to safeguard Dorset's character.

Public response

- Not a clear overall vision to safeguard Dorset's character.

By 2038 this will be improved with high quality developments that bring the homes, jobs and supporting infrastructure that Dorset needs

Environmental groups (non-statutory)

- The Vision should 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.

Developers/Landowners/Agents

- Amend second paragraph of Vision to highlight the role the spatial development strategy will play in delivering sustainable patterns of growth - ‘in sustainable locations that help reduce the need to travel.

We will reduce our carbon footprint and seek to enhance our natural environment

Natural England

- Vision should seek to ensure that we fully meet our commitments to carbon reduction targets and not simply “reduce our carbon footprint”.

Dorset Wildlife Trust

- Para 2 - amend to: “We will reduce our carbon footprint in line with the Paris Agreement and ~~seek to~~ we will enhance and recover our natural environment.’. Also link carbon reduction to the Parish Agreement.

RSPB

- The phrase ‘seek to enhance’ the natural environment is very weak and undermines the intention elsewhere in the plan to address the ongoing ecological emergency. We suggest that this is rephrased to ‘will enhance’ the natural environment.

Woodland Trust

- Vision should emphasise how healthy natural environment underpins a healthy and resilient future Dorset. 'Seek to enhance our natural environment' is weak; this should read 'high quality developments support a significantly reduced carbon footprint and a significantly enhanced natural environment'.

Environmental groups (non-statutory)

- Paragraph 2 - The Council should state that it will enhance our natural environment, not 'seek to' enhance it.
- Paragraph 2 - Amend to read: 'We will reduce our carbon footprint'.

Developers/Landowners/Agents

- Support reference to enhancements to the natural environment, but it should be explicit that opportunities to do so can also include benefits linked to development.

The main centres for economic activity of south east Dorset and the Dorchester to Weymouth corridor will be enhanced

Developers/Landowners/Agents

- Vision only refers to the beauty / enhancement of rural areas. Fails to recognise the equal importance of the commercial / economic role rural areas play within the district.
- Supports the Plan's vision, particularly its identification of the London – Weymouth Rail Corridor as the main centre for economic activity within Dorset.

Public response

- Enhancing the 'Dorchester to Weymouth corridor' faces major constraints resulting from the high landscape value of the AONB and the Southern Ridgeway - vision statement is not realistic.
- If the plan aims at the development of a major urban and industrial area in central Dorset, then the vision needs to promote this.

Excellent employment opportunities will exist at the towns with sustainable travel opportunities

Town and Parish Councils

- No vision of a high skilled well rewarded workforce who can build careers in Dorset.

Developers/Landowners/Agents

- Vision should say more about achieving sustainability and seek sustainable travel within as well as between town and villages.

Public response

- Vision is agreed especially concerning the development of excellent employment opportunities.

The towns across the area will act as hubs for their rural hinterlands

Public response

- How will people get to the 'hubs' referred to in the vision?

The beauty of the rural area will be maintained and enhanced where opportunities arise

Dorset AONB

- Welcome reference to ‘beauty’ of Dorset. However, clear reference to conserving and enhancing landscape and scenic beauty within the vision would be appropriate, in light of the importance of the landscape assets contained within the Plan area and the statutory requirements placed on the authority.

Town and Parish Councils

- Not clear how the vision relates to the needs of rural areas.

Developers/Landowners/Agents

- To ensure the Vision reflects the needs of rural communities, the text should read: “The beauty of the rural area will be maintained and enhanced where opportunities arise, ensuring that the natural environment is considered in tandem with the needs of and challenges facing rural communities and the wider economy.”
- Vision only refers to the beauty / enhancement of rural areas. Fails to recognise the equal importance of the commercial / economic role rural areas play within the district.

Public response

- The idea that ‘The beauty of the rural area will be maintained’ contradicts the idea of large scale employment growth, residential growth and the very major development of renewable technologies on green field sites.

The area’s rich heritage, hedgerows, trees and the character of the landscape will be respected

Dorset Wildlife Trust

- Para 5: amend to: “The area’s rich heritage, hedgerows, trees, other habitats and the character of the landscape will be ~~respected~~ valued and retained where development takes place.

Cranborne Chase AONB

- There is no clear reference to sustaining, conserving and enhancing the nationally and internationally designated landscapes which are such a fundamental feature of the County.

Woodland Trust

- We welcome ‘The area’s rich heritage, hedgerows, trees and the character of the landscape will be respected where development takes place’.

The large areas of significance for biodiversity will be protected

Natural England

- What is meant by “large areas of significance for biodiversity will be protected”? In one sense, the whole of Dorset is of significance for biodiversity, similarly small sites will warrant full protection. Reword Vision to refer to the protection, restoration and enhancement of the land identified within the Dorset ecological network.

Dorset Wildlife Trust

- ~~The large areas of significance for Biodiversity will be protected and enhanced throughout the area and where opportunities will be actively pursued to ensure that arise, real enhancements to the natural environment in 2038 supports more wildlife and that in all areas of Dorset accessible natural greenspace is within easy reach. will be realised.~~

Environmental groups (non-statutory)

- Support for recognition of large areas of significance for biodiversity and that these will be protected.
- Paragraph 2 - “large areas of biodiversity” should be proactively protected, rather than currently “where opportunities arise”.

Public response

- What are the criteria for “significance”? How large is large? Delete the word “large” please.
- All areas of significance for biodiversity must be protected, not just the large areas and the vision should express an intention to actively connect and enhance these, not merely when the opportunities arise.

Real enhancements to the natural environment will be realised

Natural England

- Welcome the aspiration to realise “real enhancements” for the natural environment.

Historic England

- Amend final sentence to: ‘...real enhancements to the natural and historic environment will be realised’.

RSPB

- Welcome the intention to realise ‘real enhancements’ to the natural environment, although perhaps there should be clarification of what ‘real’ enhancements are. For example, it would be better to refer to priority habitats within the Dorset ecological network such as heathland.

Environmental groups (non-statutory)

- Paragraph 5: The Council should not just seek real enhancements to the natural environment where opportunities arise, but should realize them strategically, significantly and in a planned way. The phrase ‘where opportunities arise’ should be removed.

Public response

- Vision should recognize the essentially rural nature of Dorset and seek to protect it.

1.3. Vision – Other issues

Strategic vision

Town and Parish Councils

- The plan does not provide a strategic vision for the future but revisits old ideas, concepts, and ways of living.
- More joined up thinking around vision and priorities, avoid loss of market towns, addressing issues arising from an aging population (encouraging young people to the county and retaining

them), provision of employment and housing for younger people, brownfield list is out of date and less renewable energy than other councils.

Developers/Landowners/Agents

- Vision should provide more on achieving the optimal balance between jobs, homes and infrastructure in suitable locations (in particular addressing the implications of an aging population). Add this to the strategic vision relating to suitable housing: “We will continue to co-operate with adjoining authorities, to agree on appropriate strategies for addressing their unmet housing needs, where this is reasonable for us to do so and consistent with national guidance.”
- Vision should be more positive about the opportunities to strengthen the relationships with existing service centres and main towns that border the Local Plan area.

Public response

- There is no real linking up of the major elements of housing, jobs, infrastructure, transport, open spaces, nature, land use and how to achieve the Council’s aim of net zero carbon by 2050.
- Audits of the degree of compliance of planning decisions with policies in the Local Plan should include obtaining feedback from parish and town councils of their experience.

Climate and Ecological emergency

Natural England

- The scope of the Vision should reflect the ecological emergency by committing to actively seek opportunities for the delivery of large-scale enhancements of the natural environment.

Town and Parish Councils

- Vision and strategy are clear but little detail as to how they will be achieved (e.g. measures to combat climate change and how appropriate facilities and services to support housing are provided).
- Issues surrounding climate change are not given enough weight, and the new ways in which people will work and be employed are not considered thoroughly enough.
- Concern that the Vision does not steer the Council towards a low carbon future of energy of efficient housing, ‘green economic development’, enhanced public transport over cars, and carbon free energy generation and use.
- Need for a robust vision of a low carbon Dorset, a beacon of sustainable agriculture, fisheries, industry, transport and tourism.

Environmental groups (non-statutory)

- The vision needs to be bold and specific, showing how the Plan will achieve zero carbon by 2030.
- Let-out clauses in Vision suggest there is no ecological emergency – there should be an unequivocal commitment to enhance Dorset’s Natural Environment.

Community groups (non-statutory)

- Vision should be bolder - a much more ambitious, zero-GHG approach to transport.

Public response

- Vision should be for a Dorset that is an ‘Eco-Tourist champion’ attracting visitors all year.
- Vision needs to be overhauled to refer to a just transition to net zero carbon by 2030.
- The local plan does not outline an immediate and proportionate response to the climate change emergency.

- Vision should be of a decarbonised Dorset, with new homes that are Net Zero including in respect of not generating fossil fuel traffic, retrofitting existing houses, energy needs met by renewable sources, a sustainable economy which draws on the natural resources and attractions of the county, and ambitious targets which demonstrate that Dorset leads the climate agenda.

Farming and rural areas

Cranborne Chase AONB

- Large area of the County is agricultural, but the Vision does not mention farming or food production from the land or the seas.
- The Vision should establish the County as an exemplar for environmental management.

Developers/Landowners/Agents

- Vision does not refer to the value and importance of rural economic development which is important in Dorset.
- Rural areas should not just be preserved but need to diversify and evolve to bring important economic and environmental benefits to the local area and residents.
- Vision lacks reference to rural sustainability and capacity for innovation in agriculture and other rural activities. Rural area makes up large part of the plan area. Suggest adding: “The towns across the area will act as hubs for their rural hinterlands providing many of the services that people need on a frequent basis. The plan will also provide for initiatives to support rural sustainability and innovation, on a carefully managed basis, secured where practical through neighbourhood plans, or with the support of the relevant Parish Council or community.”

Issues related to the Covid-19 pandemic

AAH Planning Consultants on behalf of Clive & Jacqueline Raymond

- The local plan should consider the effect of the coronavirus pandemic on house building and the deliverability of the Council’s current five-year housing land supply.

Arne Parish Council

- The issue of how Dorset can proceed into a post Covid-19 future is inadequately addressed.

Buckhorn Weston & Kington Magna Parish Council

- The effects of Covid-19 are not referenced in the draft plan, such as continued working from home after the epidemic is over.

Corfe Mullen Town Council

- Work patterns from the pandemic are likely to continue, so stronger justification for the housing figures is required.

Dorchester Town Council

- There is no attempt to think through the potential outcome of the Covid-19 pandemic.
- The impact of the Covid-19 pandemic is not addressed in the strategy in any meaningful way. It could have a fundamental impact on overall housing (not just employment) needs, both locally and nationally.

Dorset Climate Action Network

- The impact of increased working full- or part-time from home needs to be considered in new housing design.

Lytchett Matravers PC

- The Office for National Statistics (ONS) was unable to publish reliable statistics for the past year due to the unknown impacts of Covid-19.

Milborne St Andrews Parish Council

- Paragraph 2.2.10 discusses the effects of the Covid-19 pandemic. However, this is not really addressed in the strategy in any meaningful way and no real consideration has been given to what impact this could have on housing (not just employment) needs.

Symondsbury Parish Council

- It is not clear how the Council intends to respond to the impacts of Covid-19 on assessed housing need.
- The need for employment land is likely to change because of the impacts of the Covid-19 pandemic.
- Some employment allocations will contribute to meeting the needs of other Council areas.

Public response

- The impact of the Covid-19 pandemic has not been adequately factored in, especially in relation to the changes in people's working patterns.
- The impact Covid-19 will have on the amount of people moving out of cities needs to be considered.
- After the Covid-19 pandemic the whole economic model must change as we will never return to the pre-lockdown patterns of working.
- The draft plan should acknowledge that the assessment of 'housing need' may need to be adjusted to reflect the post-Covid 19 situation. The housing target is unrealistic due to the impacts of Covid-19.
- There is a lack of adjustments post Covid-19 to take account of different working patterns, different economic growth, the likelihood that fewer children will be born, less disposable income, and the likelihood that fewer people are going to be able to afford homes in affluent areas such as Wimborne / Colehill.
- People have left the country due to the lockdowns. A million people have left the UK since the Covid-19 pandemic, which is a good reason to revise the housing target.
- The local plan should consider the effect of the Covid-19 pandemic on house building and the deliverability of the Council's current five-year housing land supply.
- Due to the exceptional circumstances of the pandemic the standard method should not be used to calculate local housing need in Dorset.
- Housing development should be postponed until the impacts of the Covid-19 pandemic on housing need become clearer.

Social objectives

Dorset County Hospital NHS Trust

- To fully meet the needs of the communities within Dorset (esp ageing population), there should be more emphasis on the importance of healthcare services within communities. The Vision is silent on how these will be improved by the end of the plan period.
- The Vision is silent on the social aspect of Dorset being a great place to live, work and visit. It is vital that the Vision incorporates how the LP will support vibrant, strong and healthy communities.

Town and Parish Councils

- Post Covid, there is a desperate need for recovery, but this is not discussed in detail.
- The vision/strategy does not properly take account of the Brexit and Covid-19 pandemic on employment, housing and transport.
- Plan shows very little vision towards improving communities.

Developers/Landowners/Agents

- Vision does not highlight the importance of redressing imbalances of ageing population and increasingly smaller workforce – suggest an additional paragraph to emphasise this.
- Vision should recognise the need to plan for a mix of homes and tenures to meet local needs - in line with housing objectives of the plan and NPPF.

Environmental objectives

The National Trust

- The Council must manage existing pressures on the environment. The Purbeck area requires a formal traffic and visitor management plan to facilitate sustainable tourism and access by local people and visitors whilst safeguarding natural and historic environments.

Town and Parish Councils

- This part of the local plan does not refer to proposals for a national park in Dorset.

Environmental groups (non-statutory)

- Concern with lack of reference to ecological networks.
- No mention of Nature Parks - amend wording to incorporate this.

Economic objectives

Public response

- Tourism should feature within the vision - growth and investment into tourism is not acknowledged within the introductory key issues nor within the vision.
- The plan has very little to say about tourism - vision needs to be clear that the plan is proposing a major shift away from the traditional employment basis of much of the area.
- Respondent considers that there is a need to recover the knowledge and capacity on how things are made in our towns, by connecting citizens with the advanced technologies that are transforming our everyday life.
- Respondent notes that the needs of towns are changing, and that they are already struggling to adapt to structural shifts in the economy, consumer habits and lifestyle choices.

1.4. Strategic priorities – Approach

Approach to Strategic Priorities

Town and Parish Councils

- Strategic priorities lack substance and appear to be, in the wake of the Covid pandemic, already out of date to where we are.

Environmental groups (non-statutory)

- There is no sense of urgency in the strategic priorities.

- The Local Plan should include a section or table explaining how each of the key issues identified in the plan are being addressed, either through the Local Plan or through other plans or programmes. This should help clarify what fundamental changes to the Plan are needed.
- Concern with emphasis of the plan on housing growth, workspace and supporting infrastructure – cannot be achieved without damage to rich heritage.

Community groups (non-statutory)

- All the priorities are connected but they don't seem to be connected in the local plan.

1.5. Strategic priorities – Climate and ecological emergency

Strategic priorities - climate and ecological emergency

Natural England

- Aspiration should be to avert the ongoing ecological emergency by reversing the current declines of all wildlife interests, including protected species and priority habitats.
- Strategic priorities should be extended to seek/support opportunities to maximise wildlife restoration and enhancement of all development through policies that support the restoration and enhancement of wildlife interests, reduce pollutants to water, improve air quality and improve carbon sequestration.
- Housing and employment targets should be matched by clear commitments to deliver a specified minimum area of new and restored wildlife habitat and accessible green infrastructure.

Dorset Wildlife Trust

- The Plan should take action to reduce emissions and enable adaptation, not just minimise the impact of climate change.

Dorset AONB

- Concerning references to 'climate emergency', suggest that there are opportunities for more substantial further statements throughout the Plan, so as to create a 'golden thread' that runs through the document. Widened environmental strategic aim that includes landscape conservation and enhancement, given that so much of the Plan area is subject to nation/international landscape and ecological designations.

Woodland Trust

- Welcome that the climate and ecology emergency is a key priority. It is important to ensure these crises are responded to in an integrated way.
- Priority should be strengthened - need to factor in role of natural carbon storage. Developments should not compromise the resilience of the natural environment in the context of a changing climate. Sustainably sourced timber should be made explicit to help support low carbon developments.

National Trust

- Support commitment to tackle climate change and all new development incorporating ecological net gain and commitment to protect and enhance environment.

Environmental groups (non-statutory)

- Should be strengthened - makes no reference to the need for rapid reduction in greenhouse gas emissions, as required by law.

- Non-designated landscapes, ecological sites, hedgerows, tree cover etc are neglected and undervalued by the Local Plan.
- recommend adding the terms ‘mitigate’ and ‘adapt’ to clearly raise awareness and understanding of these terms.
- The Local Plan is a powerful tool for implementing the Council’s own Climate & Ecological Emergency Strategy and Action Plan.

Town and Parish Councils

- Need for stronger statements on addressing the climate and ecological emergency.

Community groups (non-statutory)

- Addressing Climate and Nature Recovery should be higher priorities in the plan.
- Carbon negative by 2030.

Developers/Landowners/Agents

- Priority 1 and priority 3 should be reframed to refer to the need to balance climate and environmental / ecological interests with the need to provide much-needed housing, sustain growth of the local economy and the welfare of its local communities.
- The priority should also seek to adapt to the effects of climate change.
- Support for the Strategic Priorities which look to enable development in the most appropriate locations whilst minimising impacts on the environment and bringing about net gains in biodiversity.

Public response

- Need to reflect the Dorset Council Plan 2020-2024 – placing the Climate and Ecological Emergency at the core.
- Climate change is a core consideration that should be considered for every proposal and every settlement must minimise its impact on the climate.
- Climate and ecological emergency should underpin every policy in the plan.
- Wording misses the “avoid, mitigate, compensate at a last resort” protocol.
- Concern that the statement relating to the climate emergency does not convey the vigour that is needed to truly address either the climate crisis or the ecological emergency.
- There is no mention of the need to reduce carbon emissions.

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

RSPB

- Separate out the commitment to take action to minimise the *impact* of climate change, from *actions* to reduce emissions, so the plan is clear on which is which.

Environmental groups (non-statutory)

- Paragraph 1 - Amend to: ‘We will help reduce climate change impacts by enhancing and extending ecological networks, avoiding building in areas at risk of flooding and incorporating green infrastructure into developments.’

Public response

- Amend to read: “We will take actions to reduce greenhouse gas emissions from the whole of Dorset to net zero by 2050 at the latest and to minimise the impact of climate change...”.

We will support renewable energy developments appropriate to Dorset

Town and Parish Councils

- Renewable energy, reduced travel and minimised energy use are supported.

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

Natural England

- Welcomes the support for biodiversity net gain from development. However, at best this will deliver a 10% uplift.

Dorset Wildlife Trust

- Amend biodiversity sentence to: “We will ensure that all new development protects natural habitats, avoids harmful impacts and incorporates wildlife enhancement and ecological net gain to help deliver the aspiration to reverse the current ecological emergency.~~decline in protected species and habitats.~~”

Town and Parish Councils

- ‘Ecological net gain’ needs clearer definition.

Environmental groups (non-statutory)

- Paragraph 2 – Amend to: ‘We will ensure that all new development incorporates ecological net gain to help reverse the decline of protected species and habitats.’
- Recommend that ‘protected’ (protected species) is removed– we need to be protecting and enhancing all wildlife species, not waiting until they are protected.

Public response

- The word “protected” from “species and habitats” needs to be removed – we should be protecting and enhancing all species not just those that are protected.
- Lack of evidence of ecological gain in specific development allocations.

Through managing where and how development takes place, the Local Plan can minimise the distance travelled and focus travel onto active travel and public transport options.

Dorset Wildlife Trust

- Amend ‘how the Local Plan will meet this priority’ to: “Through managing where and how development takes place, the Local Plan ~~can~~ will minimise the distance travelled and focus travel onto active travel and public transport options. Emissions will be reduced by requiring the highest standards of energy efficiency, reduction in non-renewable resource use in development and through renewable energy generation.”

Environmental groups (non-statutory)

- The plan is not minimising the impact of flooding, or minimising travel by car.

Developers/Landowners/Agents

- While it is important to minimise travel distances the local plan also needs to acknowledge that in the rural parts of the district this cannot always be achieved. A focus on sustainability / reducing travel distances should not preclude beneficial development in rural areas.

Measures will be required to mitigate any impact on important ecological sites.

Dorset Wildlife Trust

- Measures will be required to avoid, reduce and mitigate any impact on biodiversity and to create and enhance more than is lost (net gain). Major strategic biodiversity and green infrastructure sites will be created. ~~important ecological sites.~~

Environmental groups (non-statutory)

- Paragraph 3 - order of precedence (mitigation hierarchy) is avoid, mitigate and, if all else fails, compensate (NPPF175) - Change to Adverse impact on priority habitats will be avoided.
- Paragraph 3 should recognise that the Plan should prioritise avoiding impact on ecologically important sites before seeking options for mitigation for that impact which is unavoidable.
- Concern with approach to 'mitigate' rather than 'protect and enhance' in 'how' section of the priority.
- The 'how' required to protect important ecological sites is not to select development sites that are going to damage them in the first place.
- Wish for emphasis on strategy to avoid, mitigate, compensate as a last resort.

Public response

- Approach focuses only on important ecological sites, whereas development should mitigate and enhance on all sites because there will always be some impact to the environment.

The impacts of climate change can be reduced by avoiding areas at risk of flooding and building green infrastructure (including space for biodiversity) into developments.

Dorset Wildlife Trust

- The impacts of climate change can be reduced by avoiding areas at risk of flooding, reducing water consumption and building green infrastructure (including space for biodiversity) into developments to benefit health and wellbeing as well as providing natural shading, flood amelioration and helping maintain local air and water quality.

Wessex Water

- Priority should include the need to "minimise water use".
- Section does not identify an objective to protect water supplies. Development should not impact upon Source Protection Zones or reduce the amount of water that can be extracted from sources.

Environmental groups (non-statutory)

- Paragraph 4 - Amend to: "We will help reduce the impacts of climate change by enhancing and extending ecological networks, avoiding building in areas at risk of ground water or fluvial flooding and incorporating appropriate green infrastructure into developments."
- Paragraph 4, avoiding building in areas of high flood-risk should be extended to include areas where natural flood management might be used to better protect downstream communities.

Incorporating green infrastructure and space for biodiversity into developments is important, but this should include building connectivity of high-quality habitat networks.

- Should refer to reducing water consumption, which in Dorset often comes from groundwater abstraction, which poses risks to Dorset's chalk streams. Reducing per capita consumption in new developments will limit their impact on water demand, which will help protect the natural environment.
- Lack of emphasis on biodiversity.

1.6. Strategic priorities – Economic Growth

We will deliver sustainable economic growth and improved infrastructure across the whole of Dorset, increasing productivity and the number of high quality jobs, and creating great places to live, work and visit.

Businesses

- This Economy strategic priority is agreed.

Environmental groups (non-statutory)

- Wording should be extended to include reference to a “green, circular and truly sustainable economy”.

Developers/Landowners/Agents

- As with the Vision statement there needs to be an equal focus on rural economic growth as on growth within the towns and villages.
- The priority should be to align growth and infrastructure.

Public response

- Need to state that strategic infrastructure and service improvements will form part of the planning process and not an afterthought.
- Economic growth strategy needs revising in light of Covid, Brexit, and climate and ecological emergencies - economic growth strategy is not a good title for what needs to be done - there has been a paradigm shift.
- Queries links to LEP/LNP - should link into carbon neutral Dorset and carbon neutral UK by 2030?
- Council should qualify use of the term “sustainable economic growth” or at least define it.
- 'Sustainable economic growth' is an oxymoron - our emergencies have been caused by growth.
- Instead of a focus on homes, the Economic Growth Strategic Priority should emphasise the need to identify and build out a minimum amount of employment space to employ the additional population.
- Employers have largely left Dorset and have not been replaced by newer opportunities at the same scale.
- To create replacement high tech and professional opportunities requires much more work by the DLEP to promote the Dorset Innovation Park, Portland Port, Portland Southwell, Weymouth and Dorchester Industrial Areas.
- Innovative thinking and incentives are required to draw in new high-tech start-ups and the role of DLEP needs to be part of the local plan.
- Relying on tourism and leisure industries isn't going to create a sustainable future for future generations.

- Plan does not recognise the diverse sectors that contribute to economic growth in Dorset - growth of the tourist industry will provide a vital contribution.

The Local Plan can help to deliver economic growth by enabling sustainable economic development in the right locations and providing homes for those who work in the area. Infrastructure provision to meet the area's needs is important to facilitating this growth.

Public response

- In “How the Local Plan will meet this priority” insert the words “carbon neutral”.

Around 21,000 new jobs are to be created across the area over the lifetime of this Plan.

Town and Parish Councils

- A case needs to be made that Dorset needs 21,000 new jobs.

Public response

- The vision to create 21,000 jobs is commendable, but there is little detail how it will be achieved.
- Economic growth: it is not clear how 21,000 new jobs will be created.

1.7. Strategic priorities – Unique environment

We will protect and enhance Dorset's unique environment by delivering sustainable development which respects the area's biodiversity and increases the natural capital value of these assets, in recognition of the benefits this will bring to the economy and to our wellbeing.

Natural England

- Description of Dorset's unique environment should be expanded to include its protected landscapes, Jurassic Coast World Heritage Site, and heritage assets.

Woodland Trust

- We welcome protection and enhancement of the 'Unique environment' strategic priority.

Historic England

- Disappointed that strategic policies do not include any mention of conserving and enhancing the historic environment. Amend Unique Environment to: 'increases the natural capital value of these assets and conserves and enhances its historic environment, in recognition of the benefits.'

Dorset Wildlife Trust

- Welcome the references to Dorset's unique biodiversity assets.
- Section should also refer to Dorset's coast and marine environment, landscapes and heritage.

Dorset AONB

- Priority is too narrow and seems to relate primarily to biodiversity.
- Referring to 'natural beauty, biodiversity and cultural heritage...' would better reflect the diverse character of the environmental assets.

Cranborne Chase AONB

- Misconception that the unique environment can be protected and enhanced by delivering sustainable development.
- Some aspects, such as biodiversity, may be calculated to show an increase when development is permitted. However, that is only a small part of the overall environment.
- A positive way to further this priority would be an explicit commitment to work with the AONB partnerships to achieve the statutory goals of conserving and enhancing natural beauty.
- Strategic priorities – mismatch between economic growth and ‘unique environment’ – suggest that a positive way to further this priority would be an explicit commitment to work with the AONB partnerships to achieve statutory goals.

Town and Parish Councils

- Natural capital value seems to be valued solely for its contribution to the economy.
- No commitment to encouraging all towns and villages to develop in distinct ways.

Environmental groups (non-statutory)

- The plan is not committed to protecting Dorset’s unique environment.

Developers/Landowners/Agents

- ‘Unique environment’ should be called ‘Distinctive built and rural environment’.
- Objective 1 and Objective 3 should be reframed to refer to the need to balance climate and environmental / ecological interests with the need to provide much-needed housing, sustain growth of the local economy and the welfare of its local communities.

Public response

- Geology and topography of Dorset make it unique - environment is Dorset's asset and policy must protect it at all costs - policy should be for no negative impact on the unique environment.
- Should mention phosphates regarding eutrophication and its ecological impact.
- Unique environment: building on the green belt, or in other green spaces, will not ‘respect ...biodiversity and increase natural capital’.
- Emphasis on AONBs but no mentions of SSSIs in particular Dorset Heaths.
- Need to manage the impact of the planned developments on Dorset’s environment covering biodiversity, pollution flooding coastal erosion, landscape and heritage.
- Ambitions should also take account of the vital need to preserve the county's built and natural environment.
- The vision/strategic priorities do not adequately recognise national importance of Dorset's landscapes or include commitments to protect/enhance their qualities or biodiversity.
- The vision/strategic priorities should acknowledge the contribution of the natural environment (including tranquillity, remoteness, panoramic views, dark skies and nature) to health and wellbeing of current/future residents and visitors.
- 50% of Dorset is within AONBs, many areas are in the Green Belt, while other environmental designations recognise the exceptional quality of Dorset’s landscapes and wildlife.

The Local Plan will enable development in the most appropriate locations whilst also minimising the impact of population growth and economic activity on Dorset's environment, and bringing about net gains in biodiversity.

Environmental groups (non-statutory)

- Highlighting biodiversity here creates an impression that the environment and biodiversity are interchangeable terms - but the latter is a component of the former - should rewrite priority to capture the way the various components of the environment are connected to create the overall asset and its value to Dorset, should also emphasise biodiversity net gain more. Constraints are viewed negatively - at odds with the positive framing of the asset of Dorset's unique environment - should differentiate between constraints and assets.
- Amend to: 'The Local Plan will enable development via allocation to land with least environmental value, avoiding impact to designated sites, priority habitats, ecological networks and Section 41 species and, incorporate Green Infrastructure within development proposals'.
- Recommend adding a reference to mitigating the impacts of development through nitrate mitigation.

1.8. 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.

Town and Parish Councils

- Homes should be provided to meet Dorset's actual needs (not needs assessed on a national formula).
- The wording "including affordable housing" should be replaced by "particularly affordable housing."
- The aim of meeting the housing needs of those who wish to live and work in the area is supported, except those who want second homes.
- The imposition of Government housing targets based on a national formula should be resisted.

Environmental groups (non-statutory)

- Suggestion of third strategic priority in relation to housing – "Contribution to combat Climate Change and to strengthen biodiversity - 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".

Developers/Landowners/Agents

- Strong support for Objective 4 and the delivery of suitable housing to provide for local needs.
- Objective 4 should be moved to the top and become Objective 1.
- Object - does not seek to deliver sufficient housing through the Plan period, considering that BCP cannot meet its own needs.
- Concern that specialist housing for older people and accessible housing has not been identified in the housing priority - more emphasis must be placed upon the housing needs of this group.

- Should be 'Sufficient suitable housing' as making sure enough homes are delivered is a key strategic issue.
- Should be called 'Suitable mix and types of homes'.
- C2 housing and housing for older people should be considered a strategic priority.
- Should support people who work in Dorset, including in leisure and tourism, and align with increasing ageing population - should include 'enable those who grew up in Dorset to stay, work and retire in Dorset – also add reference to “growing elderly population”.
- Partnership working should be added as a strategic priority to help deliver the change envisaged by the draft Plan.

Public response

- Priority should ensure that new housing contributes to combatting climate change and strengthening biodiversity by setting net zero carbon standards in all new buildings now, not in 2025, as proposed by the Government.
- No mention of green energy and affordable energy in any future housing.
- Support commitment to focus onto active travel and public transport options but nothing in the rest of the document to meet this.
- Housing supply and affordability are main issues in rural areas.
- This points to needs to improve transport facilities and make rural areas more accessible.
- Need for policies setting out the mix of homes on development sites including the size and type of homes (including affordable homes) and the delivery of care facilities.

We want to enable those who grow up in Dorset to stay in Dorset.

Town and Parish Councils

- The Strategic Priority for housing “to enable those who grow up in Dorset to stay in Dorset” is supported.

Housing is one of the key outputs of the Local Plan. Housing, including affordable housing, will be provided across the plan area to meet the needs of those who wish to live and work in the area.

Dorset CCG

- Important to improve older housing stock to prevent physical and mental health problems. Support for specialist purpose-built accommodation as an alternative, cost effective option for service users as currently the local market is overpriced due to limited alternatives and availability. It is essential that the impact of any new housing development will have on health and care services availability will be considered at the outset of planning.

Around 30,000 new homes will be provided over the lifetime of this plan, of a range of types, sizes and tenures to meet Dorset’s diverse needs.

Developers/Landowners/Agents

- Housing target is not ambitious - need to help address issue of affordability. Need to take a positive approach with higher housing figure - improve social, economic and environmental conditions for its inhabitants through development.
- Suggest the following be added to the end of this priority ‘We will continue to co-operate with adjoining authorities, to agree on appropriate strategies for addressing their unmet housing needs, where this is reasonable for us to do so and consistent with national guidance’.

Public response

- Vision subjugated to housing targets - plan needs coherent optimistic and inspirational vision with housing based on local need not housing targets.

1.9. Strategic priorities – Strong, healthy communities

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

Town and Parish Councils

- To improve CO2 emissions and contribute to healthy lifestyles the plan states individuals should travel less than half an hour by public transport or a 20-minute car journey to their place of employment. We do not feel this aspiration will be met.

Dorset CCG

- Support for inclusion of the importance of building strong and healthy communities with access to the necessary infrastructure and green space so people can feel safe to be involved in their community, take regular exercise and work and for active travel provision.

Public response

- Strategic aim of the plan should be to ensure that communities are stable and resilient in order to thrive in good times and to withstand the shocks of future events.
- Plan should support communities during (for example) periods of violent weather or pandemics and planning to take account of climate change.
- Importance of reliable and resilient high-speed broadband to every home and business – important for work and business, and remote health working, support for the elderly and infirm.
- Need for modern communication systems for home learning - education service should also be involved in the planning for the future.

The Local Plan will enable communities to thrive by providing community infrastructure and green space giving opportunities for people to meet and participate in their community.

Environmental groups (non-statutory)

- Paragraph 2. Change to: “...by providing community infrastructure and high quality greenspace...” (NB greenspace in this context is normally written as a single word).
- 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’.

1.10. Strategic priorities – Staying safe and well

We will work to enable a good quality of life for our residents through high quality, well designed and safe developments, with access to local greenspace for health and wellbeing.

Town and Parish Councils

- The terms “High quality, well-designed” are subjective.

Environmental groups (non-statutory)

- Paragraph 1 - Change to: "...with access to local natural greenspace for health and wellbeing".
- Wish for consistency in use of "green space" or "greenspace".

Dorset County Hospital NHS Trust

- The Strategic Priorities are silent on the community needs and infrastructure required to support new development and the creation of new communities. There is no acknowledgement for the need for services to help residents who require assistance with healthcare.
- LP must acknowledge the importance of healthcare to the local communities and allow healthcare providers the flexibility to ensure the best use from their assets (inc. land) in the short and long term for the benefit of the local communities.

Public response

- No mention of healthcare facilities in policies.
- Welcome the emphasis on social issues, the challenge of achieving social justice and of building resilience into communities.

Through town centre regeneration and by protecting town centres, the Local Plan will enhance people's quality of life.

Public response

- No detail is included about how the Plan will deliver strong healthy communities via town centre regeneration or building strong communities – these are two of the most pressing issues.

Healthy lifestyles will be promoted through the way development is designed, by building in safe and convenient routes for active travel, recreational opportunities and access to green space.

Developers/Landowners/Agents

- Staying safe and well should also promote more healthy lifestyles e.g. more cycling and walking and should seek access to local greenspace 'for recreation'.

2. Policy DEV1: The housing requirement and the need for employment land in Dorset

2.1. Paragraph 2.2.3 - Plan period

Agree with the length of the plan period

Persimmon / Pegasus Group on behalf of Persimmon

- The 15-year plan period from adoption in Spring 2023 is supported. The timetable to adoption is potentially achievable but is very challenging. Should it be delayed, the plan period should be extended.

Savills on behalf of the Bryanston Estate

- We agree with the approach to Plan for a minimum 15 year period from 2021 to 2038, assuming adoption takes place in 2023.

Savills on behalf of P and D Crocker

- We support the plan period covering a minimum period of 15 years post adoption as required by the National Planning Policy Framework.
- The Council should extend the plan period to 2040 to build in further flexibility to account for potential delays to the local plan programme to adoption. This would increase the housing requirement for Dorset from 30,481 to 34,067 and to over 40,000 new homes when unmet need from the BCP Council is factored in.

Savills on behalf of Yuill Farms Ltd

- We support reference to the local plan period of 15 years following adoption, and suggest that the period is further extended to 2040 to build in flexibility and take account of potential delays to the plan making process.
- We suggest that extending the plan period, in conjunction with unmet need, would increase the homes needed to in excess of 40,000.

Calls for a longer plan period

Developers/Landowners/Agents

- Plan should be extended to 2040 to build in flexibility due to potential delays to the plan's adoption.

Commercial Freeholds Ltd

- The proposed plan period is 17 years, with 15 years remaining on adoption. This is the minimum required by national policy and we have no objection to this.

Gladman Homes

- The plan period should be extended to cover 25 years.

Greenslade Taylor Hunt on behalf of Messrs J C, R I & M J Drake and Mrs S A Dean

- The housing need calculation represents an unambitious benchmark as the plan period only lasts for 17 years. It does not look far enough into the future. The Council should take a positive approach and look at least 25 years into the future.

Morrish Homes / Greenslade Taylor Hunt on behalf of Morrish Homes

- The housing need calculation represents an unambitious benchmark as the plan period only lasts for 17 years. It does not look far enough into the future. The Council should take a positive approach and look at least 25 years into the future.

Origin3 on behalf of Obsidian Strategic

- The plan period should be extended to 2040. It is likely that there will be some delay in the preparation of the plan and that it will not have a minimum of 15 years from adoption.
- Extending the Plan period will increase the housing requirement to 34,067 dwellings, plus the unmet need arising from the BCP Council area, which still needs to be added.

Savills on behalf of Hallam Land Management Ltd

- The plan period should be amended to cover the period of 2021-2040 to allow for probable delays to the anticipated adoption year of 2023, to be more robust and to plan for growth until 2040.
- The plan period should be extended to cover the period 2021 to 2040 to allow for likely delays. This would increase the housing requirement for from 30,481 to 34,067 and when factoring in

the unmet need of BCP Council we consider the figure could rise to in excess of 40,000 new homes.

- The Council's emerging development strategy does not provide sufficient land to meet the assessed needs of the area.

Savills on behalf of The Trustees of MALF Pitt Rivers

- The Council should extend the plan period to 2040 to build in further flexibility to account for potential delays to the local plan programme to adoption.
- Extending the plan period alone would increase the housing requirement for the local plan from 30,481 to 34,067 and when factoring in the unmet need of BCP Council we consider the figure could rise to in excess of 40,000 new homes.

Calls for a shorter plan period

Public response

- It is not clear why the Council is going well beyond 5 years to allow unconstrained development on a 17-year projection.
- Given the uncertainties about the level of housing needed, the plan should work to an interim 5-year period to be reviewed when national circumstances have stabilised.
- It is unnecessary to plan for housing for more than 10 years, which would give a figure of 17,930 dwellings, not 39,285.
- The housing target is unambitious in terms of having a plan period lasting for only 17 years.
- Building should be stretched over an extended period to allow for steady, balanced growth.
- The Council should take a positive approach and look at least 25 years into the future.
- The plan should look at demand over 30-50 years. If need will be decreasing in that time, then building housing would be a mistake.

2.2. Paragraph 2.2.3 - Housing need

Calculating the housing need

Town and Parish Councils

- It is not clear how the housing figure has been calculated and how it relates to existing local plans.
- Dorset Council needs to develop a robust defence for this reduced housing need, which should be distributed where needed.
- Dorset Council needs to demonstrate that it has made all best efforts to follow the guidance.
- Little analysis is provided justify either of the housing or employment targets.
- It is not clear whether the housing / employment figures reflect the Western Gateway Plan.

Environmental groups (non-statutory)

- Query the need for such a high housing requirement, particularly as a minimum.
- The plan should focus on the housing need which arises mainly within the County, which can be met within the assessed capacity outside environmental constraints, with a practicable increase in supporting infrastructure and services.
- Start again on assessing how many homes are really needed, the figures being used are out of date and incorrect.

Developers/Landowners/Agents

- Insufficient evidence to conclude which level the Council should set as the new plan's housing requirement.

Public response

- Suggestion that the housing need figure is too high.
- The local area is being asked to accept too many new homes. Too many houses are being proposed, after taking account of the housing requirement and extant permissions.
- There is no need for further market homes / for additional homes to purchase.
- The figures are not based on documented need in Dorset and includes an extra margin imposed by Dorset Council to accommodate unmet needs from neighbouring authorities.
- The need for further homes in Dorset is not justified.
- The housing needs stated in the draft plan are not objectively assessed, are unclear, imprecise, and out-of-date.
- The idea that average earnings are an indicator of how many houses should be built is questionable. It suggests that if earnings fall further, developers should build more houses and if earnings rise, then they should build less, which seems unlikely to be true.
- Need to state the problems that will arise if the need is not met.
- Respondent queries whether the standard method is the most appropriate way of calculating housing needs in Dorset Council area.
- Growth of the population is not driving assessments of housing need.
- Housing demand is not a measure of housing need; social housing has been destroyed and replaced.
- Not clear whether the effects of Brexit have been considered when calculating housing need.
- Recognise the standard method is the starting point but strive beyond this to address affordability issues.
- Govt algorithm is based on out-dated statistics from 2014 rather than the 2016 household projections published by ONS, which suggest lower housing needs, 2018 based projections released in June 2020 show even lower projections and a lower level of need - this plan caters for 50% higher figures.
- In terms of the wording: a minimum average rate is meaningless: it can be either a minimum rate or an average rate - average will only be accessible at (or near) the end of the period and so makes life easy for the Council but adds no value for the public.
- Housing need is based on outdated pre covid data.
- The Council should review housing need before publishing the next draft of the local plan (taking account of forthcoming planning reforms).
- Change housing requirement to 20,000 and employment to 100 ha to reflect exceptional circumstances in Dorset due to land constraints.
- The assessed need for housing should take account of retirees and incoming workers.
- In a county like Dorset the demand is insatiable as so many people like to retire here.
- Dorset should not have to provide up to 37% of it's housing to accommodate net in-migration.
- New immigration laws will limit in-migration.
- The housing numbers must be challenged as they are inappropriate to Dorset's AONB.
- Dorset's heritage should have been used as a reason for taking an alternative approach to calculating the scale of development.

Recognition of the need for housing

Town and Parish Councils

- Recognition that more homes are needed in Dorset.
- The evidence post-pandemic is that more people from urban areas will want to move to places like Dorset.

Public response

- We appreciate the need for the Council to provide more housing in Dorset to meet its legal and Government targets.
- The Council has no option but to obey Government directives on housing numbers.
- Support the use of the Government's standard method to identify local housing need.
- In the absence of any details about how the Government calculates housing need, one can only be guided by the Council's recommendations.

Housing needs assessment

Developers/Landowners/Agents

- A SHMA / housing need assessment should be undertaken to determine whether the need to deliver more affordable dwellings in Dorset may justify a higher overall housing requirement.
- Separate SHMAs are needed to assess housing need within each functional area.
- The outcome of a commissioned housing needs assessment would be fundamental in shaping the strategy and approach for growth over the local plan period. Without it, the housing requirement for Dorset and a sound basis for strategic planning cannot be established.

Public response

- The plan makes no reference to a housing needs assessment.
- There is no evidence that a housing needs assessment has been undertaken.
- The Council should commission its own evidence to locally assess housing need (in particular the need for affordable homes).
- More evidence is needed on housing needs which should be broken down by area to clearly establish the amount and type of housing needed in each area.

Uncertainty over future needs

Public response

- It is difficult to agree or disagree with the plan, given the levels of uncertainty surrounding policy areas.
- Forecasts of housing demand over a 15-year period are impossible to make with the certainty shown in the draft plan.
- It is not clear how we can plan on the stated housing numbers for 17 years when the baseline has shifted significantly.
- The Council should caution against trying to predict demands which are actually difficult to predict. Instead, we should have a plan that can maximise flexibility and adaptability in response to actual events.
- The plan should reflect uncertainties and keep them under review. We should not unnecessarily damage our beautiful County with housing estates that are not required.

Declining population

Chideock Parish Council

- Dorset's population is declining overall.

Public response

- In western countries populations are starting to fall, which affects the need for additional housing.
- The Office for National Statistics forecast a 25% reduction in projected annual household growth, which will affect the projected housing need figures.
- Population projections are dropping and any increase in household formation rates is caused by the growth of one-person households or households of just adults without children. It is not increased by a higher birth rate.
- The approach will encourage youth, especially better educated / qualified young people, to leave for more affordable areas with better job prospects.
- Population growth in the Purbeck area is minimal.

Other influences on need

Town and Parish Councils

- As there is such a high degree of environmental constraints in Dorset, it is appropriate that they can influence the Council's consideration of how many homes can be sustainably accommodated.
- The local plan needs to address the reasons why so much housing stock is unavailable.
- The housing figure does not appear to be 'economically led'.

Local community groups (non-statutory)

- Extant planning consents, which have yet to be completed have not been considered as part of the 30,000 new homes proposed.
- Some housing numbers were wrongly reported in the draft Local Plan.

Developers/Landowners/Agents

- Other factors (e.g., unmet need from neighbouring authorities, affordability and economic growth ambitions, second homes etc.) may require the baseline housing need figure to be adjusted.
- Don't believe adoption timetable will be achieved and the council should plan for more houses to account for this.

Public response

- The plan makes no reference to the continual increase in the effective housing stock arising from extensions, loft conversions etc. Although the number of dwellings may not have risen, their capacity to accommodate people has and this needs to be taken into account.
- The assessed need for housing should be adjusted because there are now fewer jobs in Dorset.
- Much deeper investigation and justification is required to establish actual housing need, taking account of affordability and the need for rural housing.

Housing needs across the plan area/local needs

Town and Parish Councils

- Approach creates a 'one size fits all' scenario which takes no account of local housing needs and infrastructure requirements.
- The housing numbers in the draft Dorset Local Plan are above those in the Purbeck District Local Plan, which is of great concern, as they do not reflect the local need but more the needs of developers.
- Local government is best placed to determine what is realistically needed in their areas and numbers should not be scaled up to fit with national projections.
- The Council needs to think again and to prepare a local plan which addresses the genuine needs of rural Dorset.
- Sub-area targets should be included in the plan to ensure that failure of delivery on one side of the Council area will not have to be remedied by further growth in a completely different area if the housing land supply falls below 5 years.

Local community groups (non-statutory)

- The 30,000 new homes proposed for Dorset comes from central Government targets rather than from a local needs analysis.
- The housing requirement methodology is largely driven by Government. It does not necessarily take account of local needs on which neighbourhood plans are founded.

Environmental groups (non-statutory)

- Dorset Council should research local housing needs to establish the type and amount of housing that is needed in the area, in terms of addressing local needs for housing, and how this might differ from the standard methodology.

Developers/Landowners/Agents

- It would be useful to have a separate table of housing supply for each functional area.
- The Council should not take a broad brush approach to applying the final housing figure across the whole of the 'new' plan area. It should allow for the needs of the area to be more 'localised'.

Public response

- The local plan has one housing figure, but the area has more than one housing need.
- The draft local plan fails to robustly identify and respond to needs at the local level.
- Assessment of housing need using the Government's method does not reflect local needs (as assessed through the housing needs assessment prepared for the Weymouth Neighbourhood Plan).
- The housing requirement should be re-assessed having regard to 'local needs'.
- The number of homes should be determined by local authorities, which know their areas better than central Government.
- Housing targets should be set by analysing the needs of the place, by consulting the local communities, the Town and Parish Councils and using their local plans and priorities.
- Standardised criteria should be applied equally by each local authority to take account of local issues as well as accommodating incoming workers, retirees etc. Under this approach, the sum of the whole would better reflect the need for housing across the country and would be more acceptable to the population.

2.3. Paragraph 2.2.4 – The 'Standard Method'

The standard method calculation

Town and Parish Councils

- The housing number derived from the standard method is excessive. Independent estimates suggest that housing numbers are grossly in excess of the actual local need.
- As stated in the NPPF, the figure derived from the standard method should not represent a 'target' but a starting point for assessing housing numbers.
- The vision for Dorset in the draft local plan is subjugated to the perceived need to subscribe to the housing targets provided by the Government's standard method.
- Previous Government projections in other fields have not been renowned for their accuracy.
- The target does not (and should) take into account environmental constraints, which can impact on sustainability.
- There is a concern that further potential for binding housing numbers will come forward from Government after public consultation has taken place.
- There is no clear explanation of how the housing figure was calculated, just that the standard method was used.
- The housing requirement (calculated using the standard method) does not take account of all the requirements of the neighbourhood plans.
- Dorset is suffering from the imposition of national controls over housing land supply calculations.
- The gross figures of 30,000 new homes and 21,000 jobs seem out of proportion (with a bias towards delivery of new homes), and the housing figure does not appear to be 'economically led'.

Environmental groups (non-statutory)

- Object to the approach of calculating housing need, which does not take account of the impacts on AONBs, the Green Belt, landscape, and biodiversity.
- The draft plan does not mention the guidance from Government that the standard method is simply a starting point for determining the level of need. It does not override the provisions in the NPPF for the protection of designated areas.
- The housing requirement risks an oversupply of housing, which will use up valuable land and may just encourage more second-home owners to come to the County.

Developers/Landowners/Agents

- Support for the baseline housing requirement, which is based on the standard method.
- Support the indication that the Council intends to follow any subsequent revisions to the housing methodology.

Public response

- The plan should specify the specific calculations used to determine local housing need. The 'standard method' is inadequate as a description.
- The Council recognises that the Government is currently changing the way in which housing targets are calculated and that the assessed need for housing will be reconsidered to reflect the latest evidence.

- A cautious approach should be adopted by local government. This is crucial as the housing requirement figures are the main pillar underpinning local and neighbourhood plans.
- Although the calculation of housing need using the standard method is correct, it includes a totally unscientific ‘affordability uplift’ of almost 50%.
- The Government’s standard method for assessing housing need is flawed / not robust / not valid.
- The standard method is not mandatory and the figures used allow for a 37% increase, even though net migration has fallen. The figure for local housing need bears little relationship to the needs of the actual population.
- The Council should refer to the housing needs assessment prepared for CPRE by ORS in 2020. CPRE says inflated rates of net migration and other factors were used in the calculation of homes needed and this will lead to unaffordable housing for locals.
- The Government algorithm is based on out-dated statistics from 2014 rather than the 2016 household projections published by ONS, which suggest lower housing needs. By failing to use the 2016 projections, the Council has failed in its duty of care to residents.
- The 2018 based projections released in June 2020 show even lower projections and a lower level of need.
- The assessment of housing need should be based on the latest census.
- The Council needs to assess and apply data from the 2021 Census before production of the local plan.

Challenging/reviewing the housing number calculation

Town and Parish Councils

- The standard method needs to be challenged, as it is out of date. The need is probably for around 20,000 homes, as suggested by other assessments such as the one produced by Dorset CPRE.
- Dorset Council needs to demonstrate that the local plan meets actual need and should challenge the housing figures.
- Dorset Council should challenge these centrally imposed housing targets. The NPPF provides that exceptional circumstances can justify an alternative approach to centrally imposed figures (for example because over 50% of Dorset falls with AONBs).
- The Council should argue its case for reduced housing numbers based on land constraints, such as Green Belt and SSSIs.

Local community groups (non-statutory)

- The Government has said that the standard method is not a target and, most importantly those figures do not override the protections offered in the NPPF and through Green Belt provisions and the AONB.
- It is the impact of this proposed housing on our protected landscapes which causes us particular concern and we ask that the issue of housing requirements be reconsidered.

Environmental groups (non-statutory)

- A radical re-thinking of the mathematical basis for the strategy is required.
- The Council must ensure that the housing numbers reflect the extent of designations and areas of ecological significance in Dorset and ensure that the approach to growth reflects the potential additional impacts and pressures this level of new housing could lead to.
- The re-calculation of housing need may have impacts on the need for employment land.

Developers/Landowners/Agents

- The local housing need figure should be reviewed as the standard method for calculating housing need does not take account of other issues such as affordability.
- The housing target should be set above the minimum requirement.
- The Council should investigate whether providing further homes would help to address key issues facing the area (i.e., ageing population, affordability of homes, availability of jobs, sustainable patterns of travel and young people migrating out of the area).
- It is not clear whether economic growth can be realised without increasing housing targets above those calculated using the standard method.

Public response

- The Council should challenge the national standard method for calculating housing need.
- The plan should take account of the planned revision to the National Planning Practice Framework (NPPF).
- I would like to have seen fundamental questioning of the number of homes needed under alternate futures. The plan should embody a more radical response to the climate and ecological emergency.
- Attempts to meet the Government's figures for housing need have compromised policies in the local plan.
- The Government says 'it is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints.'
- The key to a successful Local Plan for Dorset is a challenge to the Government's housing need figures, an evidence-based assessment of local needs and a solution which ensures no further encroachment on Green Belt land.
- The Local Plan should reflect genuine local housing needs and not be driven by unrealistic and unnecessary government set targets that do not reflect the local situation.

Exceptional circumstances

Environmental groups (non-statutory)

- There is a strong basis for a claim that Dorset has exceptional circumstances which justify an alternative approach to assessing the need for housing growth.

Developers/Landowners/Agents

- There are no exceptional circumstances to justify a different approach to the standard method for assessing local housing need. The Council should note that the local housing need assessment may vary over time.

Public response

- The Council should determine whether there are 'exceptional circumstances' for not applying the national standard method for assessing housing needs.
- Dorset needs to take a different approach because a huge amount of the County is protected land (56% AONB), the average house price is twelve times the average salary and there is a large number of second homes, which contribute little to the local economy and village life.
- The NPPF allows for exceptional circumstances to justify an alternative approach to the standard method. Such circumstances exist in Dorset, which include: the exceptional landscape quality and rich heritage of the landscapes, including AONBs which cover 50% of the county; habitats for

nature and wildlife including river catchments; geological features including the coastal World Heritage Site; the need to protect the extensive areas of Green Belt: a wealth of history in the towns; numerous built heritage designations; the need to maintain and enhance the tourist economy; and the traffic congestion, which is caused partly by the lack of any motorway in Dorset.

Changes to Government methodology/planning system

Town and Parish Councils

- It seems perverse to consult on housing figures which are going to be subject to review by the Government. Taking the plan forward at this stage would be premature.
- It is not clear how the Council will prepare for Government changes to the planning system that will affect the standard method and the housing requirement for Dorset. It is not clear whether this will be resolved before publication.

Local community groups (non-statutory)

- Dorset CPRE has commissioned research on this issue and this has caused us to question Dorset Council's calculations, particularly in the light of the acknowledgement, within the draft plan, that the Government itself has proposed changes to the standard method.

Developers/Landowners/Agents

- The draft plan needs to be updated in the light of the Government's intention to change the standard method and to introduce binding targets, removing the requirement to meet unmet need from neighbouring areas.
- The Council should accept that the proposals made as part of the Planning Reform White Paper in August 2020 do not provide an excuse to 'fail to plan' in the interim.

Public response

- The Government is considering changing the method for calculating housing need in the Planning for the Future White Paper (2020), recognising the strain it puts on rural areas, the lack of focus on the renewal of towns and cities and the risk it poses to protected landscapes and the Green Belt. The plan should be based on the housing needs that will need to be recalculated as part of the White Paper.
- The Government's recent 'changes to the current planning system' document says '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'.
- Dorset Council is premature in pushing forward with analysing housing need before Government policy is changed.
- The Council should take account of the reforms to the planning system being considered.
- The housing requirement should be adjusted (down) to reflect constraints.
- Our local MPs should stop the Government from sticking its oar in regarding the numbers of properties that should be built in Dorset and they should present a strong reason for rethinking how this can be achieved without destroying what we hold dear.

Population

Town and Parish Councils

- CPRE research on housing numbers shows that the Government's housing targets are in excess of any sensible forecast of local housing need. The Government's targets and algorithm are based on outdated and flawed population and household projections.

Developers/Landowners/Agents

- It is unfortunate that the standard method is dependent on population and household projections which in Dorset reflect more than 40 years of constrained housing growth.

Public response

- The projected housing need seems to take no account of population projections.
- Over the next decade or so an increasing volume of housing stock will become available due to natural fluctuations in the demographics of the population. It is not clear whether this has been taken into consideration.
- Out-of-date population and household projections were used in the standard method calculation for Dorset, resulting in a large overestimate of housing need.
- There are concerns that the misinterpretation of population movements is causing anomalies in the figures, particularly in relation to swings in population and age ranges where there are university students.

Other approaches to calculating need

Public response

- The Government's assessment of housing need is arbitrary. A systems / holistic approach should be applied to determine housing need which takes account of the impacts of growth to determine the 'real need' for homes.
- The 'real need' for housing should be determined through an analysis of past housing building rates and through a referendum with local people.
- The actual need for housing for both market properties and affordable homes for local people needs to be established.
- The Council should set out what it believes to be the appropriate number of homes for Dorset, side by side with the quota determined by the Government.

2.4. Paragraphs 2.2.5 - 2.2.6: unmet need from adjoining areas

Developers/Landowners/Agents

- Dorset is likely to need to accommodate some of the wider housing needs from BCP Council, New Forest District Council and New Forest National Park Authority required by the Duty to Cooperate.

Public response

- Dorset Council is likely to be asked to meet unmet need from the Bournemouth, Christchurch and Poole and New Forest areas.
- Dorset Council should not have to plan to meet the unmet need from neighbouring councils.
- The recognition in the draft plan that there is some unmet need from BCP and New Forest is welcomed. However, the plan needs to consider economic needs as well as housing need.

- There is a lack of imagination and sensitivity in the policy, especially if development to serve the BCP area extends into Dorset.
- It is unlikely that there will be unmet need from the BCP area, given the size of that area and the availability of suitable sites there.

Government policy and guidance

Town and Parish Councils

- Following consultation, the Government may abolish the Duty to Cooperate. On that basis, the text about meeting unmet need from neighbouring areas should be removed.

Environmental groups (non-statutory)

- There is no obligation on Dorset Council to meet unmet needs from neighbours, if requested, as the Duty to Co-operate was withdrawn in 2018.

Developers/Landowners/Agents

- We are concerned that the Council is questioning whether the Government's emerging changes to the planning system may remove the need to meet unmet needs from adjacent authorities. There is no indication that this will not remain a matter that Local Plans will have to consider.
- The Council has not complied with planning policy / guidance because it has not published a statement of common ground in conjunction with its draft plan.

Public response

- The Duty to Co-operate no longer applies.
- It is not clear what imperative there is on BCP to meet its own needs. It seems that there is every incentive for it to pass its requirements onto Dorset which in turn would create pressure for the release of Green Belt land.

The level of unmet need

New Forest National Park Authority (NFNPA)

- There is a modest level of undersupply in the adopted New Forest National Park Local Plan (460 dwellings to 2036) against the objectively assessed need. NFNPA is working with the Partnership for South Hampshire and aims to resolve the issue of unmet housing need through sub-regional work focused on South Hampshire. At this point NFNPA is unable to quantify the unmet need (if any) from the National Park that will need to be planned for.

Town and Parish Councils

- It is important to quantify the unmet housing need of neighbouring authorities.
- It is not clear why housing needs for neighbouring authorities cannot be calculated.
- There is a concern that higher housing targets will be needed to meet the unmet need from neighbouring areas.
- The figure of potential unmet need arising from BCP Council should be published as soon as possible.
- As the Parish Council understands it, the housing target is high in part due to a potential unmet need from BCP and the New Forest.

Developers/Landowners/Agents

- The Council should plan for higher amounts of housing to accommodate unmet needs from neighbouring authorities, support strategic infrastructure improvements and encourage

economic growth, particularly where population projections are indicating higher levels of growth is anticipated.

- DEV1 should be amended to reflect the 'duty to co-operate'. It should include an uplift to meet unmet need from adjoining areas: BCP Council area and New Forest authorities.
- It is not clear whether the provision of housing takes into account the currently unknown unmet need from neighbouring authorities.
- The level of unmet need from Bournemouth, Christchurch and Poole Council, which may be as many as 9,000 homes, could radically change the strategy required in Dorset.
- The housing need figure needs to be updated to reflect the revised standard method numbers relevant to the plan area that were published in December 2020, calculated to be 1,834 dwellings per annum (dpa) for Dorset Council.
- The figure of 1,834 dpa should be used as the minimum requirement for the emerging Local Plan policies.
- The draft Local Plan needs to take into account the shortfall from neighbouring authorities, particularly BCP. Currently the housing numbers in the draft plan are insufficient to accommodate this.
- Additional sites should be allocated to meet the as yet unquantified housing need.

Public response

- Policy DEV1 gives a false impression of the number of new homes needed, because it does not take account of the unmet needs of neighbouring areas. The policy may require adjustment to take account of this unmet need.
- The figure of 9,000 extra homes to meet the unmet needs of neighbouring areas (mainly BCP) is based on unbacked assumptions and the extra land required will cause harm to communities and increase environmental pressures in the County.
- BCP should have assisted Dorset Council with housing numbers.
- An unmet need figure should have been included at this stage, even if it was a draft figure to be confirmed.

Further work and justification

East Devon District Council

- With reference to paragraph 2.2.5, work has not been undertaken by East Devon District Council (EDDC) in relation to meeting housing need, so it is too early to draw the conclusion that EDDC can meet their own need.
- Meeting housing needs should be discussed through the Duty to Cooperate.

Town and Parish Councils

- There is no obvious evidence of engagement between Dorset Council and BCP, which was thought to be the role of the Strategic Planning Forum.
- Co-operation with neighbouring authorities has not been demonstrated in respect of the available brownfield sites which could accommodate further housing before development of any Green Belt land.
- We would like to see evidence that all brownfield sites with potential for development in BCP have been allocated and to show that the two councils are working together to meet the housing need in Dorset.

Environmental groups (non-statutory)

- Dorset Council should openly engage with the adjoining authorities and publish in a timely fashion the evidence underpinning any notion of unmet housing need that can be properly scrutinised. Given that Dorset Council's Local Plan is already proposing the release of Green Belt land, it would appear reasonable for the Council to state that Dorset too faces challenges in terms of meeting its own housing needs and should not offer to accommodate the unmet need from the conurbation.
- There has been no formal request from adjoining Councils for help to meet their housing needs.

Developers/Landowners/Agents

- BCP Council's requirements need to be known in order to plan properly for the SE Dorset area.
- Further work is needed to demonstrate whether the additional needs of neighbouring authorities should and can be met in order to demonstrate that the Duty to Co-operate has been appropriately engaged.
- The Council has a responsibility to engage with other councils through the Duty to Co-operate and to ensure that the local plan is positively prepared in an attempt to meet any unmet need arising from these neighbouring areas.
- It is not possible (without a published statement of common ground) to ascertain whether the Duty to Co-operate has been satisfied.

Public response

- There appears to be an acceptance in the plan that Dorset's housing supply target may have to increase to meet the 'unmet need from neighbouring areas'. However, the level of unmet need is unknown. It is a concern that this important piece of information is missing.
- The approach to plan-making is not evidence-based as the level of unmet need from neighbouring areas is not known.
- The strategy for meeting unmet need from other areas has not been adequately justified.
- There is no justification to provide for unmet need from BCP before they prepare their plan. Their housing numbers will be bolstered by town centre changes.
- The plan cannot proceed with any certainty until the unmet housing need figure from neighbouring councils has been calculated.
- Statements of Common Ground should have been agreed between Dorset Council and all of these neighbouring authorities as part of the plan preparation process, to quantify the unmet need figure.
- It is unclear how the Council has engaged with neighbouring authorities to determine unmet need.
- There is a failure to demonstrate the Duty to Cooperate, especially in terms of the brownfield sites in the BCP area which could be developed before Green Belt land, which would enable the more efficient use of land.

Challenging the need to meet unmet need from neighbouring authorities

Local community groups (non-statutory)

- The Council should not simply accept that Dorset should take a share of the unmet demand from Bournemouth, Christchurch, Poole and the New Forest. Dorset has very large Areas of Outstanding Natural Beauty (AONBs) as well as much other land of local landscape importance and highly sensitive coastal areas, resulting in very limited availability of suitable land for development.

Public response

- The Council should challenge the premise that it is required to meet the unmet needs from neighbouring authorities. If it happens, then these authorities should fund the additional cost of infrastructure needed to go with the extra housing that is over and above Dorset's needs.
- Meeting the housing needs of neighbouring areas should be resisted to prevent the loss of Green Belt land.

Constraints in neighbouring areas

Local community groups (non-statutory)

- It is obvious that New Forest District cannot take on an overflow of housing needed by BCP in the future.

Developers/Landowners/Agents

- The Plan does not currently make allowance for the potential unmet need from neighbouring authorities, which have little scope to expand their housing supply, either because they lack physical space (such as the BCP Council area) or because they have national levels of protection such as the New Forest National Park.
- There is not much undeveloped land in the BCP area so it is almost inevitable that Dorset will have to increase its housing requirement significantly to meet the unmet need.

Public response

- There may be a need to meet unmet housing need from South Somerset if they are not able to resolve the phosphates issue that is currently holding up housing delivery in their District.

Impacts of addressing unmet need from neighboring areas

Town and Parish Councils

- Concern that the approach would mean the South-west would become one large development which is contrary to the characteristics of Dorset.

Developers/Landowners/Agents

- We suggest that the programme in the LDS will not be achievable if the Council is to address unmet need from neighbouring areas.

Public response

- It is not clear why areas in other counties are allowed to have their unmet needs met by Dorset when it has not been demonstrated that Dorset can meet its own needs without severely damaging existing localities.
- Meeting the needs of neighbouring authorities will have the effect of increasing commuting distance to work militating against a drive towards zero carbon.
- The rationale behind building houses for future employees from the BCP area is queried as this will have an urbanising impact in South-east Dorset.

Comments in relation to specific areas/sites/settlements

Developers/Landowners/Agents

- Given its location on the London – Weymouth Rail Corridor, Crossways / Moreton Station is sustainably located to accommodate unmet needs from the BCP area.

- The Council anticipates South Somerset and Wiltshire will be able to meet their own housing needs, but there is no evidence of any discussions held with any neighbouring Council to confirm the likely position.
- Any unmet needs from the New Forest and BCP should be met within the South-east Dorset Functional Area, where Wimborne / Colehill is one of the most logical locations to achieve this.

Public response

- Delivering any unmet need from the New Forest or BCP will need to be geographically close to the source of unmet need.

2.5. Paragraph 2.2.7: allocating more land than needed to meet housing targets

Dorchester Town Council

- There are concerns with the proposed over-supply of housing. The draft plan proposes significantly (30%) more housing than its 'starting point' of 30,481 dwellings.
- The argument that allocating more housing will provide some contingency, should the housing delivery falter, does not stand up to scrutiny.

Environmental groups (non-statutory)

- There should be no expectation for Dorset Council to exceed its housing target, and further consideration should be given as to whether the housing needs can be met in full given the environmental constraints. Sites that would not contribute towards sustainable development should be removed from the plan.
- We are concerned with the proposal for an oversupply of housing.
- Oversupply suggests that the Council has not identified appropriate sites to meet identified needs, giving rise to uncertainty about if / when some sites could be developed.
- Oversupply should also be avoided because the Council has stated that it intends to search for sites for possible new settlements. New settlements should not have to compete with a significant pool of zoned but undeveloped land elsewhere.

Developers/Landowners/Agents

- The approach of planning for at least 17 years with a buffer of additional supply is considered reasonable and appropriate.
- The approach of providing a supply of housing land to significantly exceed the minimum housing requirement is supported.
- A significant buffer is necessary given that the plan is largely reliant on a small number of large sites which, in the absence of any evidence the contrary, cannot be confirmed to be deliverable in full during the plan period.
- The Council should over allocate housing land to ensure flexibility, choice and competition in the housing market reflecting Government guidance.

Public response

- The Council should over allocate housing land to ensure flexibility, choice and competition in the housing market reflecting Government guidance.
- The housing requirement should be above the local housing need figure from the standard method with an additional buffer to take account of economic growth. A 20% buffer is

recommended to future proof the plan and provide flexibility, choice and competition in the housing market.

- The housing land supply identified in the local plan exceeds the assessed need. There should be no expectation that the Council should plan to meet a higher target.
- The supply of homes from proposed housing allocations, commitments and windfall exceeds that needed in Dorset (using Government's method to calculate need).
- I strongly disagree with the proposal to include extra land to meet more than the over-calculated housing requirement.
- There are concerns that the plan proposes significantly (30%) more housing than its starting point of 30,481 dwellings.
- The Local Plan target to build 39,285 houses in the period to 2038 is 8,804 more than the Government's target based on the standard method. Is there a clear need for such an ambitious target?
- It would be helpful to know what percentage of land has been over-allocated.
- The housing target for the next 17 years is 30,481 as set by Government, but Dorset Council are proposing 39,285 houses - so they plan to build 29% more houses than required, which is also 47% higher than the existing Local Plans in Dorset. This is way in excess of any sensible forecast of local housing need.
- Identifying too many possible housing sites is likely to have unintended consequences. It will allow developers to cherry pick the easiest or most lucrative sites.
- The Council should not plan to oversupply homes because the local plan does not take account of Brexit (specifically the reduction in migration into the UK).

2.6. Paragraph 2.2.8: the average annual rate of housing development

Town and Parish Councils

- It is unclear at what rate dwellings will be delivered (Gillingham Town Council).
- Paragraph 2.2.8 needs clarification. Does it mean that if a functional area does not meet its housing requirement, this can be met in an adjoining functional area or vice versa?
- An increased housing target will exacerbate existing problems, and in order for the council to meet its own targets on healthy lives and reducing carbon emissions it will need to revise its ambitious housing targets.

Developers/Landowners/Agents

- The supporting text (paragraph 2.2.8) recognises that the minimum housing provision figure set out may need to be increased, should any unmet need from adjoining areas be identified. However, this point should be explicit in draft Policy DEV1 itself.
- Given the physical and particularly the environment constraints within Dorset, and the need to ensure housing targets are continually met, the continued sufficient supply of land for housing is of paramount importance.

Public response

- The plan should set out the current delivery rate for housing in Dorset.
- Large house building companies will manipulate completions to a rate that will not flood the market in order to maintain high prices. Why else is there such a large number of unbuilt permissions across the country? And yet we allocate more. A means to force a more rapid built

out of the type of houses we actually need is necessary together with a focus on those we need and not vast estates of market housing.

2.7. Paragraphs 2.2.9 and 2.2.10: the need for employment land (and jobs)

Support for employment need

Dorset Climate Action Network

- Job creation, including the spontaneous creation and expansion of small and medium-sized firms in the rural areas, is essential to enable people to remain in their locality, reducing the need to travel.

Public response

- I support new building and the creation of jobs. Job creation is essential for allowing people to remain in their local area for work, and to reduce the need to travel.
- The approach is supported. We need more and better paid jobs in Dorset.

The level of employment need

Town and Parish Councils

- The number of new jobs that Dorset Council believes will be generated cannot be substantiated.
- There is a lack of clarity on how housing and employment growth are related.
- It is not clear whether the 21,000 jobs proposed relate to either the 30,481 homes or the higher figure of 39,285 homes.
- A growth ratio of approximately 1 job for every 1.5 to 2 houses may not be realistic. It is unclear why the growth in housing is not more closely aligned to the proposed growth in employment, and what the implications of any imbalance would be.

Developers/Landowners/Agents

- The workspace strategy is not based on up to date evidence.
- There appears to be no compelling need under the Duty to Cooperate for northern Dorset to accommodate neighbouring councils' unmet needs.

Public response

- Unless the employment needs are met there will be no need for housing.
- The job opportunities in the plan area will not support the number of people in all the proposed new homes.
- Building homes for thousands of people without a series of specific plans to increased local jobs is a concern.
- There is a contradiction between paragraphs 1.3.19 and 5.2.2 saying that there will be a smaller workforce, but then seeking to create more jobs.
- Paragraph 2.2.9 states that the economic forecasts suggest a need for around 21,000 full time jobs. This sounds quite vague and should have a stronger assertion if it is being used as the basis for expanding housing and employment land. However, it is appreciated that it may be too early to gauge how Covid will impact this, so the plan should be delayed.
- The need for employment land ignores the increasing trend for staff to work from home and should be re-visited. This trend was underway before the impact of Covid-19.

- It is unlikely that 21,000 new FTE jobs will be created, as the figures will be impacted by Covid-19 and Brexit. Many new jobs will not be location dependent.
- Automation is projected to result in the loss of 40% of jobs. This will dramatically affect employment and unemployment and does not seem to have been taken into account.
- The forecast of 21,000 new full-time jobs up to 2038 cannot be relied upon. There is no chapter on economic strategy to justify this. All extant economic plans should be cancelled and restarted.
- The projected 21,000 new jobs would leave a 30% shortfall in provision, which either means households with no employed breadwinner or a requirement to travel outside the area.
- The forecast of 21,000 new jobs appears to be unrelated to the proposals for 30,481 (or up to 39,285) homes.
- The housing and employment land requirements should be related so that Dorset does not become a centre for retired residents, second homes or commuters to other employment areas.
- Dorset's money making activity should be allowed to expand by forcing its expansion and development in line with its history, its location, and its heritage.
- It is not clear how the decline in retail employment may have affected overall employment needs.

Evidence and justification

Town and Parish Councils

- It is unclear where stated numbers of jobs will come from, and a lack of evidence.

Public response

- More specifics are needed when discussing employment opportunities, such as what jobs, where, and how many?
- It is unclear where the proposed 21,000 extra new jobs will come from.
- It is not clear whether the assessed number of jobs needed for Dorset is up to date.
- The estimates of the new jobs needed are unjustified. House building should follow jobs.
- We need jobs to match people's abilities. The plan needs to clarify that 'high quality jobs' includes all skilled workers and not just the highly skilled.
- The 2016 Workplace Survey is out of date.
- The Government's November 2020 statement and 10 Point Plan for a Greener Economic Future should be used as the strategic context for any economic analysis.

Types of employment

Town and Parish Councils

- Employers will face a lack of local young recruits as young people are forced out of the area by high house prices and low salaries.
- New ways of working are anticipated. A better approach would be a plan that has flexibility and adaptability to respond to actual events.
- Full Time Equivalent (FTE) jobs are unlikely to provide salaries for mortgages.
- There is a need to attract a wider range of employment closer to where people live.

Public response

- The plan should recognise that jobs on employment land are not the only way to contribute to the new jobs needed over the plan period.

- The approach of stating that X new jobs will require Y hectares of new employment land is outdated in the light of the shift to working from home, which will not be fully reversed in future. The likely move towards a four day working week and other work sharing arrangements mean that a larger number of employees can be located at the same premises.

Existing employment issues

Public response

- There is a lack of local employment to sustain the projected job figures. Commuting and infrastructure issues will increase dramatically and this comes with the risk of creating ‘ghettos’ with access via car transport only.
- Businesses and employment are leaving West / rural Dorset for example, the loss of MOD work at Portland, the loss of Condor Ferries at Weymouth, the closure of Winfrith Technology Centre, and the relocation of Dorset Cereals from Poundbury.

2.8. Policy DEV1

Comments regarding the stated housing requirement – Criterion 1.

Town and Parish Councils

- Whilst there is not a set formula as yet for the East Dorset and Christchurch figure, taking a simple 50% would suggest the new figure should be in the region of 1,733 new homes, which is not significantly different from the existing target, and if based on the previous split ratio used, it would be lower still at around 1,653 new homes.
- A definition of windfall sites is required to support Criterion 1 in the Policy.

Environmental groups (non-statutory)

- Government advice on the key elements to be used in calculating housing need indicate that the increase of dwellings during the period 2011 to 2018 (1,070 dwellings per year) could be used as a straight indication of net growth in households. There is no reason to suppose that this rate would accelerate, as nationally the pace of household formation has been falling.
- A reasonable figure for housing need would be between 20,000 homes and a maximum of 25,000 over the period to 2038. This total could largely be accommodated in the existing supply, with only minor additional land avoiding the Green Belt and incursions into AONB and not requiring the North of Dorchester development.
- It is likely that certain sites will need to be deleted after surveys of biodiversity and ecological networks have taken place. Total housing provision will need to be reduced to reflect this.

Developers/Landowners/Agents

- Policy DEV1 should more strongly emphasize that 1,793 dwellings per annum is the minimum housing requirement.
- The numbers should be seen as a minimum and allow those bringing sites forward to increase density if this is achievable.
- The housing need figure should not be seen as a ‘cap’ on development. It represents a target to help meet wider aspirations to boost housing supply.
- There is no certainty that the figure of 1,793 dwellings per annum is suitable to meet housing needs as it represents the minimum number of homes needed based on the standard method.

- This figure would be contrary to the requirement to significantly boost the supply of housing embedded within the NPPF.
- The target of new homes per annum is insufficient to realise job-led housing need across the plan area.
- The Plan underestimates the amount of housing required because the estimate of windfall development (6,193 properties) is too optimistic and there is an over-reliance on previously allocated and approved projects, which may or may not come forward.
- The proposed housing numbers are not enough to achieve the vision. We need to attract people to the area.
- Policy DEV1 should be revised to ensure that the planned delivery of housing can be achieved at an appropriate rate throughout the plan period and in particular in the initial and subsequent five-year periods.
- DEV1 should make it clear that the 'minimum average' should also relate to the first five-year period, as it would not be sound to back-load the supply of new homes, to later stages of the plan period as this would not meet housing needs and address affordability.
- Draft Policy DEV1 should refer to unmet need by adding in the wording 'as well as unmet needs from neighbouring authorities under the Duty to Cooperate'.
- The housing requirement should be increased by 50%.
- The numbers stated are very specific for this stage of the plan process.

Public response

- Recommend that the minimum housing provision figure of 30,634 dwellings should be adopted, although this is likely to be considerably greater when the unmet housing needs of neighbouring authorities are taken into account.
- The plan should be setting maximum figures for housing growth, not minima that appear to allow for unconstrained development ahead of any needs.
- Lack of evidence of how the figure of 30,481 houses has been derived.
- The stated housing figures are nearly 50% higher than in the last local plan for this area and 100% higher than it has been possible to deliver recently.
- The policy needs to be underpinned by proper growth and population estimates of current Dorset residents.

Suggested lower housing requirement

Public response

- There are concerns about the volume of development proposed, which is a 17% addition to existing levels to be delivered in a short period of time.
- It is accepted that new housing is needed, but not on the scale shown in the Local Plan.
- Fewer houses with larger gardens and less concrete should be proposed.
- With less housing provision people would not be able to move into the County in such large numbers and the extra housing would not be needed.
- The housing number should be changed to 20,000 dwellings to reflect the exceptional circumstances of Dorset. A housing need of 20,000 homes is better justified and can be accommodated largely using brownfield sites and without the need to encroach on greenfield areas or the AONB.
- The housing requirement figure for Dorset should be reduced to 15,000.
- I expect to see about a 50% reduction in housing need.

Responding to changes in the requirement

Developers/Landowners/Agents

- Need to monitor the housing requirement and respond to any changes in affordability ratios.
- The proposed housing numbers are not enough to achieve the vision. We need to attract people to the area.
- The final adopted housing requirement may be influenced by the imposition or otherwise of a national binding target, reflecting proposed changes to the planning system.
- The approach in the plan provides an overly vulnerable strategy, with little margin for error should there be even just a minor change in circumstances.

Need for an uplift/buffer to the housing requirement

Developers/Landowners/Agents

- The housing requirement should be above the local housing need figure from the standard method with an additional buffer to take account of economic growth. A 20% buffer is recommended to future proof the plan and provide flexibility, choice and competition in the housing market.
- The Local Plan's ambition with respect to economic growth is supported, but an uplift in the housing requirement is necessary to support this. The target of new homes per annum is insufficient to realise job-led housing need across the plan area.
- An uplift may also be needed to respond to other factors identified in the PPG, such as growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010).
- A 20% buffer to local housing need would ensure that the plan is future proofed and provides flexibility.
- Need to meet and exceed housing delivery in order to meet not only future need, but current unmet need, including the need for affordable housing, which is a particularly pressing issue for the Council.
- The housing need figure does not take account of issues of affordability affecting much of the area.
- The Council should set a higher housing figure to improve the social, economic and environmental conditions for its inhabitants through development.
- Whilst paragraph 2.2.6 says that the target of delivering 30,481 dwellings may increase as a result of the Duty to Cooperate, we strongly suggest that this should be reflected in draft Policy DEV1.
- The Council should commission further work to establish whether an upward adjustment to the 'minimum' baseline requirement is justified to deal with the affordability of housing in the area.
- The Council should consider the option of building more houses as it could yield benefits, such as the increased delivery of affordable housing and economic growth.
- The minimum level of housing provision should be increased in order to deliver the critical mass of population needed to encourage employers to invest and to diversify the employment base leading to higher skills and wages.
- Additional allocated sites should be included in the supply to make a buffer in the housing provision figure.
- Potential unmet housing needs from the New Forest and BCP may well have a ripple effect, meaning that outlying functional areas might experience a marginal uplift.

- Insufficient evidence to conclude at which level the council should set the new local plan's housing requirement.
- While caveated in the text the numbers should be seen as a minimum and allow those bringing sites forward to increase density if this is achievable. The numbers stated are very specific for this stage of the plan process.

Public response

- The minimum level of housing provision should be increased so that younger households would be encouraged to move to the area to replace the young people leaving.
- Working practices (supported by remote working technology) could increase the demand for homes in Dorset.

Impacts of the housing requirement

Town and Parish Councils

- The stated housing numbers in the draft plan and the resultant urbanisation threatens tourism, landscape, habitats, wildlife, and heritage. In setting housing numbers, the draft plan needs to consider constraints such as Green Belt, landscape, habitat, wildlife, and heritage.
- Dorset is suffering from the imposition of national controls over housing land supply calculations.

Area specific housing targets

Town and Parish Councils

- We would like the Council to include sub-area targets for each functional area within the policy.

Developers/Landowners/Agents

- Paragraph 65 of the NPPF states that strategic policies should set out housing requirements for designated neighbourhood areas. The Council should relate this to the functional market areas defined in the draft plan.
- It would be disingenuous and unsound to group the diverse and varying needs across the County together as one without any breakdown of the overall level of housing needed within these functional areas.
- Any unmet need from the New Forest and BCP areas should be met in locations close to the source of the need and within the South East Dorset Functional Area.

Additional policy/criteria

Town and Parish Councils

- We would like the Council to include sub-area targets for each functional area within the policy.

Sherborne Castle Estate

- The Council should consider including a second policy (in addition to that outlining the requirement derived using the standard methodology) on intended housing land supply.

Developers/Landowners/Agents

- Policy DEV1 should address just the housing requirement with another separate policy outlining the actual level of housing provision being made.
- Suggested inclusion of a requirement to take account of the need for economic growth, which is a key priority for the plan.

- The policy does not recognise the need to assess, plan and provide for the growth of tourism enterprises in Dorset.

Comments regarding the stated need for employment land – Criterion II.

Beaminster Town Council

- Employment provision should include live / work units, work hubs and small units.

Symondsburry Parish Council

- Some employment allocations will contribute to meeting the needs of other Council areas.

Dorset Climate Action Network

- The need for the provision of workspace throughout the County is recognised, particularly the need for modern, well-equipped and flexible workspace.
- The proposals to zone land for workspace development in many first and second-tier towns is welcomed.
- The need for employment land should be updated to take account of increased working full- or part-time from home.

The Ramblers: Dorset Area

- The need for employment land should be considered in the context of the pandemic: there are presently large numbers of empty retail properties in Dorchester and Weymouth.

Developers/Landowners/Agents

- The estimate of employment land need should be revised to take account of Brexit, Covid-19 and changes to the Use Classes Order.
- Support the intention to reflect the employment land requirement as a minimum.
- We welcome that the assessed needs are presented as 'minimums'.
- 131 hectares of employment land under DEV1 significantly exceeds the baseline need for 52.3 hectares set out in the Workspace Strategy Update (Jan 2020). This rises to 95.6 hectares when a 'strategy scenario' adjustment is made. Clarification is required on how this adjustment has been determined and whether it is justified.
- The 131ha figure in the Workspace Strategy represents a 'no flexibility' scenario, while the 151ha caters for a high growth scenario and, in any event, helps to build in choice and range.
- Allowances for churn and 'windfall' losses increase the employment floorspace requirement to 131.1 hectares. An allowance for churn could be justified but, a windfall adjustment is not necessary. New windfall employment sites could balance out any 'unplanned' losses.
- The windfall allowance is not necessary as the plan includes employment protection policies that should prevent losses or sites that are suitable / deliverable for employment uses and employment evidence contains no assessment of net change in employment provision as a result of windfall gains.
- It is welcomed that the 'flexibility uplift' (of 10-20%) has not been carried forward into DEV1. It is unclear why this flexibility is being tested, which may be overestimated due to other allowances already included.
- There is an unexplained discrepancy between Figure 2.9 which suggests 214 hectares of employment space and the plan period set out in DEV1. There is an oversupply of 84 hectares, even when compared with the windfall figure.
- It is unclear why employment floorspace (214 hectares) has been significantly oversupplied relative to the baseline / adjusted requirements. Supply should be better aligned with need. The

deletion and/or re-designation of some sites (including land south of A30, Shaftesbury) to other uses, such as housing, should be considered.

- Respondent notes the reasoning behind the delay in purchasing an up-to-date model, not only in respect of the impacts of Brexit, but also now because of the impacts of Covid 19. The plan should however be underpinned by evidence.

The Ferndown & Uddens Business Improvement District

- The requirement in DEV 1 for a minimum of 131 hectares of employment land is supported.
- The approach in the draft plan, which does not plan for the South-east Dorset conurbation as a whole, fails to recognise the importance of the Blunts Farm and Cobham Gate employment allocations in meeting strategic economic objectives. The significance of this 30-hectare site (Blunts Farm) which provides access onto the A31 had been identified in the East Dorset Local Plan Review Options Consultation July 2018 (Draft Policy 5.18 p173).

Public response

- There is a lack of reference to the forecasts which drive the employment land figure.
- The economic analysis that the Plan is based on is inadequate.
- The definition of sustainable economic growth is questioned. The growth proposed in the draft Plan is just to meet economic growth needs at present.
- Further justification is required for the assessed need for employment land. I accept that new workspace is needed, but not on the scale shown in the local plan.
- There are concerns that the level of employment land provision is for a 50% higher rate than the current trend.
- It would be prudent to budget for the current trend and to accept that the need for new employment land may shrink over the local plan period.
- The employment land requirement should be changed to 100 hectares to reflect the exceptional circumstances of limited land resource, and impact on the environment and nature of Dorset.
- The employment space requirement calculations should reflect the way Covid has changed our ways of working. With more home working, the 'place of work' has permanently changed for many people.
- Employment development is dependant more upon the demands of businesses than anything else and currently that is very uncertain.
- It would be helpful to understand how the need for employment land has been estimated. It is unclear how the approach can be accurate without a forecast for the types of employment that will be required and the projected increase in home working.
- It is unclear why the figure of 21,000 FTE has led to such a low figure of employment land need.
- Similar to housing, an increase employment land is proposed (in fact linked with the increase in housing). Open-market housing will be bought by retirees and 2nd home owners and people with well paid jobs who won't need 'new' commercial premises. The justification of this proposed increase over and above the current trend is flawed – even before one gets to the Covid-driven (and Brexit?) change in working habits.
- We need to have plenty of employment land and buildings to attract businesses. Just building houses will lead to more commuting.
- New employment land should be allocated to encourage economic development and investment in the area, to diversify economic activity and bring better wages and skills to the area. A 50% increase in provision is the minimum necessary to achieve any significant change.
- The requirement for employment land should be increased by 100%.

- Policy DEV1 does not define the quantity of employment land needed in Weymouth over the local plan period. Existing employment uses in Weymouth should be retained and land should be allocated for further employment in the town.
- The need for large scale employment sites is decreasing. It is vital that employment is provided within rural communities by providing land for smaller units.

2.9. Developing the spatial strategy for growth in Dorset

Paragraph 2.3.1 - Achieving sustainable development

Local environmental groups (non-statutory)

- Paragraph 2.3.1 - The bullet point on environmental constraints should include areas which present opportunities for natural flood management for protection of downstream communities.

Town and Parish Councils

- Would like to see the Dorset Local Plan provide a clear and simple definition of what is understood by sustainable development.

2.10. Functional economic and housing market areas

Support

Arne Parish Council / West Moors Parish Council

- There is agreement with the functional areas and their boundaries.

Thornhackett Parish Council

- Functional areas appear to be acceptable, and housing distribution fair.

Ferndown & Uddens Business Improvement District

- The identification of the South-east Dorset Functional Area is accepted as a sensible basis for planning for this area.

Developers/Landowners/Agents

- Having regard to the plan's strategy to divide the area into four functional economic and housing market areas, this is a pragmatic proposal that takes account of the geography of the plan area and how places are functionally linked.
- Support for the identification of the four functional areas.
- The boundaries of the four functional areas are supported.
- The functional housing and economic areas reflect housing markets and economic activity.
- They are useful tools for developing the spatial strategy for such a large plan area.
- It is agreed that the boundaries of the four functional areas reflect how the area's housing markets and economy function.
- The plan's strategy to divide the area into four functional economic and housing market areas, is a pragmatic proposal, but it needs to be recognised that they are fluid and with interrelations.

Southwestern Railway

- We agree with the approach to designating functional areas.

Public response

- The Functional Area approach is reasonably pragmatic.
- The idea of functional areas is useful.

Objection

Town and Parish Councils

- Dorset Council should be more creative and ambitious in defining the different functional areas.
- Do not agree with the definition of the functional areas. The new boundaries are not justified and evidence for the justification of the boundaries should be published.
- One of the 'tests of soundness' in the NPPF is that Local Plans must be justified. However, there is a lack of any real analysis of how each functional area functions or of its strengths and weaknesses. This is needed so that any future plans can help address these issues as part of a coherent strategy.

Cranborne Chase AONB Team

- Little explanation of the rearrangement of the Northern Dorset area or the transference of Blandford and land further north and east into the South Eastern Dorset area.

Dorset Wildlife Trust

- We note that the environment in each area is described in terms of 'environmental constraints'. We suggest this should be less negatively worded. In all areas opportunities to address the climate and ecological emergency should be sought and therefore framing the environment as a negative barrier to development is unhelpful. The more neutral 'environmental context' would be better.

Developers/Landowners/Agents

- Care must be taken not to compartmentalise the functional areas and instead recognise them as fluid and with interrelations.
- The four 'functional' areas reflect the pre-pandemic functioning of Dorset's housing markets and economy and may change in the future. They are better for spatial planning purposes than the former districts, but should be referred to as 'sub-areas'.
- Strict adherence to defined functional areas and the settlement hierarchy could lead to opportunities for sustainable development being missed.
- The functional area boundaries do not reflect how the area's housing market's function. The boundaries are not absolute and there is a level of overlap.
- This section of the document does not provide the numbers of homes that it is intended are distributed to each of the four areas.
- The plan should set out the proposed housing and employment figures which are to be achieved within each functional area. This would ensure that the needs of each local area are being met.
- There is no separate housing need assessment for each functional area making commentary difficult.
- There should not be too much emphasis placed on the precise boundaries of the four functional areas as there are degrees of overlap, for example in the Crossways / Moreton, Blandford Forum and Wool / Bere Regis areas.

Public response

- I do not agree with the definition of the functional areas. There is disagreement with the approach.

- It is unclear from the information provided how the functional areas have been arrived at.
- There is no single indicator for identifying housing market areas, although the PPG suggests they should have regard to migration, commuting, and house prices.
- The boundaries of the four functional areas do not reflect how the area's housing markets and economy function.
- The functional areas are not needed and are illogical. For example, Blandford, the seat of the old North Dorset District Council should not be linked with South East Dorset.
- The functional areas do not align with planning committee areas or Parliamentary constituencies.
- There is a lack of clarity on how the data is derived and how it has informed the conclusions.
- The case for the functional economic areas is based on out-of-date and inadequate research.
- There is a lack of current housing market data and the housing studies for each of the former local authority areas may be inconsistent.
- The evidence base underpinning the functional areas pre-dates Covid-19 and should be updated to consider the potential for structural changes to the housing markets and economy.
- Disproportionate consideration is given to the East Dorset study and there is no consideration of cross-boundary issues between the eastern and western areas. It is important to see how Dorset operates as a unitary area.
- The boundaries of the functional areas are not justified. Evidence to justify the boundaries should be published.
- No consideration is given to villages within the functional areas.
- There is no data on connectivity between settlements. People travel for many reasons including leisure, education, health, shopping, family and kinship.
- There is no meaningful or relevant data on travel to work areas.
- The draft plan does not set out how housing should be distributed between the four functional areas.
- It is not clear whether the Council will monitor housing delivery in the functional areas.
- The Functional Areas background paper cites Figure 2.8 taken from the 2011 Census, but the figure does not appear to be provided in the plan or the background paper.

Figure 2.2: Functional housing and economic areas

Public response

- Figure 2.2 is illogical in totally ignoring the dominance of Yeovil in preference for a nebulous A303 corridor or the minor influence of Bridport.
- Figure 2.2 - Northern Dorset does not reflect the reality of the northern part of Dorset.

South East Dorset Functional Area

Ferndown & Uddens Business Improvement District

- We object to the strategic approach of the local plan. A single planning document is needed to cover the whole of the South-east Dorset Functional Area including Bournemouth, Christchurch and Poole, which had previously been the basis of planning for the conurbation under the South East Dorset Structure Plan.

Chapman Lily Planning on behalf of Mr and Mrs Alves

- The South East Dorset Functional Area has both rural and urban characteristics and it is commonplace for clusters of settlements to share facilities and experience a degree of interdependence.

Northern Dorset Functional Area

Public response

- In Dorset both migration and commuting data suggests an east-west distinction, with some areas in the north relating to Salisbury and some to Yeovil.
- A North-west Dorset Functional Area should be defined as a part of Northern Dorset, which is in reality an area influenced by Yeovil.
- A North-east Dorset Functional Area should be defined as part of Northern Dorset, which is influenced by a number of settlements not just Salisbury. Gillingham, the northern-most town in Dorset is almost exactly equidistant (about 30 miles) from Bath, Salisbury, Dorchester and Bournemouth and Wincanton is only 9.4 miles to the north-west.

Western Dorset Functional Area

Public response

- Lyme Regis, Wootton Fitzpaine and Thorncombe are in reality part of an Axminster Functional Area.

Blandford

Bryanston Parish Council

- We do not agree with the inclusion of Blandford in the South East Dorset functional area.
- Blandford's role as a service centre for Northern Dorset is not recognised through the proposed boundary. It would be more appropriate to divide Dorset into three functional areas (northern, eastern and western) with Blandford forming part of the Northern functional area.

Holwell

Holwell Parish Council

- It is unclear where Holwell sits spatially. Clarity is needed on whether it is in the Northern or Central Dorset Functional area.

Milton Abbas

Gleeson Strategic Land

- It is not clear which functional area Milton Abbas sits in. The text indicates it is in the Central Dorset area, but Figure 2.2 shows it in the South East Dorset area. This needs to be corrected.
- Milton Abbas should be within the South East Dorset functional area, rather than in the Central Dorset functional area because: it is closer to Blandford (8km) than it is to Dorchester (15km); the nearest primary school (Dunbury Academy in Winterborne Kingston and Winterborne Whitechurch) is in South East Dorset and the Blandford school pyramid; the default secondary school is located at Blandford; the daily bus service (X12) goes to Blandford; and the national cycle network (route 253) links to Blandford (and onto Wimborne, Bournemouth, Christchurch and Poole, whereas there is no cycle link from Milton Abbas to Dorchester).

3. The spatial strategy and settlement hierarchy

3.1. Settlement hierarchy

Comments of support

Lyme Regis Town Council

- We agree with the settlement hierarchy.

Thornhackett Parish Council

- The tiering of developments seems fair.

Southwestern Railway

- There is agreement with the approach.

Developers/Landowners/Agents

- We support the proposal for the Plan to have a settlement hierarchy.
- The hierarchy would appear to generally reflect the use and status of settlements.
- The review of the settlement hierarchy, which provides a consistent starting point for the spatial strategy, is supported.
- The plan takes a pragmatic approach to rationalising the various settlement hierarchy definitions from the legacy local plans from the former Dorset districts.

Public response

- We broadly agree with the hierarchy of settlements.
- The idea of the hierarchy of settlements is useful.

Comments of disagreement/objection

Arne Parish Council

- We disagree with the hierarchy of settlements.

Holwell Parish Council

- There is no analysis of the base data used to categorise villages in the settlement hierarchy. The plan seems to be the result of 'knitting together' previous draft plans.
- The parish council is concerned that there appears to be an assumption that all neighbourhood plans define development boundaries. (Holwell allocated specific sites in its made Plan and chose not to define a Development Boundary for our widespread parish area).
- The local plan needs to ensure that Neighbourhood Plans with allocated sites are categorised within the correct Tier of the proposed hierarchy.

Cranborne Chase AONB

- The difference between Tier 3 and Tier 4 settlements, as described in paragraph 2.3.13, is more than a little confusing.

Milborne St Andrew Parish Council

- It is not clear how settlements have been assigned to the tiers.

- It is disappointing that the provision / capacity of infrastructure (highways, public transport, utilities, superfast broadband etc.) is not clearly reflected in the bullet points in paragraph 2.3.1 under the heading ‘achieving sustainable development’.

Wool Flora and Fauna

- Disagree with distribution and hierarchy.

Sherborne and District Society CPRE

- The tiering process is too simplistic. Some villages will become unsustainable due to the tiering policy.

Dudsbury Homes

- It does not follow that settlements will remain of a size and scale commensurate with their classification.

Mission Planning on behalf of Leaping Deer Ltd

- The hierarchy generally reflects the use and status of settlements, except where settlements within Tier 3 have growth proposed that would in effect take them to a Tier 2 scale.
- Overly strict adherence to the settlement hierarchy could prove challenging and contradictory for the aims of the hierarchy and delivery of housing. The plan should seek to provide clarity and certainty but should also allow flexibility.

Community group (non-statutory)

- Tier 3 includes all 18 villages (barring East Stour) identified in the North Dorset Local Plan as a focus for growth to meet local needs.
- Not clear what happens at Tier 4 villages and which of these villages have a made neighbourhood plan.

W H White Ltd

- Development at lower-tiered settlements can support growth, especially where clusters of settlements share facilities and have a degree of interdependence.
- The Council’s strategy contains inconsistencies in relation to the Sustainability Appraisal, Green Belt assessment and the site-selection process.

Public response

- There is disagreement with the approach and with the settlement hierarchy.
- Many local people find the concept of tiers, hierarchies and hubs confusing.
- The proposed tier structure for the settlement hierarchy appears to have been almost completely discredited.
- There is a lack of a detailed settlement hierarchy of the plan area. Some villages are missing from the hierarchy for no clear reason.
- The settlement hierarchy is inconsistent.
- The background paper does not include detailed analysis of the data.
- There is a lack of understanding of the relationship between towns and their hinterlands including other larger settlements.
- The settlement hierarchy should look at connectivity not just for work but for family, leisure, health, education, etc.
- The settlement hierarchy needs to identify areas where large scale residential growth has taken place without the inclusion of any meaningful town centre amenities.

- People no longer need to live near the office due to working from home.
- The settlement hierarchy should take more regard of physical barriers such as rivers, major roads, heathland etc. which will need major infrastructure investment.
- Pubs and places of worship and should be included in village amenities.

Figure 2.3: Large Built-up areas

Public response

- It is unclear from Table 2.3 whether there is a distinction between settlements in the middle column and the right hand column.

Tier 1 Settlements

Public response

- No consideration is given to the function of Tier 1 and Tier 2 settlements. They are only analysed in terms of population size.

Tier 2 Settlements

Public response

- Tier 2 is too broad in scope and does not provide an effective tool for distributing development.
- No consideration is given to the function of Tier 1 and Tier 2 settlements. They are only analysed in terms of population size.

Tier 3 settlements

Developers/Landowners/Agents

- Growth proposed at the larger (Tier 3) villages is supported, in particular at Charminster.
- The acknowledgement that Tier 3 settlements are sustainable and can support new growth is appropriate and consistent with the approach in previous District and Borough Council Plans.
- There is a lack of regard to lower tier settlements within the hierarchy. The draft plan does not take account of the need to support the rural community and 'chocolate box' settlements will be left to stagnate.
- Support the approach of identifying larger, more sustainable (Tier 3) villages by population, existing facilities in settlements and their relative accessibility to higher order settlements.
- The Council should guard against unsustainable growth in smaller villages in Tiers 3 and 4 of the hierarchy.
- Local opportunities for Tier 3 villages are overlooked in the plan.
- Villages in Tier 3 are suitable for smaller scale or modest expansion and not simply infilling within the settlement boundary.
- The draft plan does not go far enough in ensuring that neighbourhood plans will bring forward small scale growth at Tier 3 settlements with any degree of certainty.
- Some growth should be located within the more rural parts of Northern Dorset including at smaller scale settlements, such as Tier 3 villages, which would help to maintain the vitality of rural areas and take account of paragraph 78 of the framework, which promotes housing growth in rural area.
- Smaller sites can be delivered at a faster rate than larger, allocated sites and can contribute to the five-year housing land supply. It also helps to maintain the vitality of rural areas and the retention of services and facilities.

Public response

- No evidence is provided to explain why larger villages in Tier 3 are considered sustainable.
- No definition is given to the notion of 'restrictive countryside', in relation to limitations at Tier 3 and 4 settlements.
- We need small additions of affordable homes to all villages so that local schools, pubs, shops and churches remain open, not expensive houses bought as second homes.
- There is a need to protect village boundaries in all areas for the purposes of developing good sustainable settlement patterns.

Tier 4 settlements

Char Valley Parish Council

- The plan should include a positive statement that Tier 4 settlements should remain as active and viable communities for those who work in the countryside or choose to live there. This should be based on accurate, up-to-date information about existing employment in villages.

Puncknowle and Swyre Parish Council

- The Tier system effectively excludes smaller settlements (unless they have Development Boundaries or Neighbourhood Plan allocation) from any positive housing policy.
- Unless there is public transport to a village, applications for new housing (including affordable housing) are unlikely to be approved.
- The lack of a policy to encourage local employment, affordable housing and public transport within rural villages, and encourage young people to remain in the area, is a lost opportunity.

Purbeck Transport Action Group

- The unexplained 'target' number of 500, below which settlements are categorised as 'small villages', is not going to be helpful in meeting what may be a very specific local need. It may be comfortable for planners; it is of little use to residents.

Compton Valence Farms

- There is a lack of regard to lower tier settlements within the hierarchy. The draft plan does not take account of the need to support the rural community and 'chocolate box' settlements will be left to stagnate.

Sherborne Castle Estate

- The Council should guard against unsustainable growth in smaller villages in Tiers 3 and 4 of the hierarchy.

Public response

- The tiering structure as proposed will probably ensure that over time smaller villages will die. Some of the sustainability arguments regarding selected sites are suspect.
- We need small additions of affordable homes to all villages so that local schools, pubs, shops and churches remain open, not expensive houses bought as second homes.
- The list of villages of less than 400 populations is not comprehensive. For example, Stinsford is not included.
- There is a need to protect village boundaries in all areas for purposes of developing good sustainable settlement patterns.
- The respondent submits that a development boundary should be formed around the settlement of Woodlands (to the west of Verwood) to include all of the village, in order to support delivery

of appropriate small scale infill development (NB the adopted Christchurch and East Dorset Local Plan Part 1 – Core Strategy, identifies ‘Village Infilling Policy Area’ for the village).

Settlement boundaries / defined development boundaries

Loders Parish Council

- We have serious concerns regarding the lack of differentiation between Local Plan settlement boundaries and Defined Development Boundaries established in Neighbourhood Plans.

Milborne St Andrews Parish Council

- Development boundaries around villages, which have been revised through Neighbourhood Plans (as was the case in Milborne St Andrew) are not shown on the draft Policies Map. There is no logical reason to revert to the boundaries that were last updated in the late 1990s.

Cranborne Chase AONB

- There is confusion regarding the status of neighbourhood plans within the settlement hierarchy.

Purbeck Transport Action Group

- The lack of ability to define the boundaries of all villages and hamlets makes a useful assessment of population difficult.

Hall and Woodhouse

- Respondent supports the review and amendment of village settlement boundaries, both through the local plan process and in future neighbourhood plans.
- Respondent suggests that the local plan should include a policy to allow growth to take place within and immediately adjacent to settlement boundaries (subject to meeting other development management criteria) to enable viability in villages and to help meet local needs, in housing, employment and to support local services.

Persimmon Homes

- The review of settlement boundaries at Tier 3 and 4 settlements, as set out in a Background Paper, is welcomed.
- Settlement boundaries should be referred to Development Boundaries.
- It is not necessary and may be confusing to distinguish between ‘Local Plan’ and ‘Neighbourhood Plan’ Development Boundaries.

Alderholt

Commercial Freeholds Ltd

- The approach of identifying Alderholt as a sustainable larger village within the ‘South Eastern Dorset Functional Area’ is appropriate.

CR Acquisitions

- The allocation of Alderholt in Tier 3 recognising its sustainability credentials as large village is supported.

Turley on behalf of Wyatt Homes

- Whilst acknowledging the environmental and physical constraints we note and agree that Alderholt is identified as a Tier 3 ‘larger village’ within the settlement hierarchy.

Wyatt Homes

- We agree that Alderholt should be classed as a Tier 3 larger village, although it has few services, little employment and is not well connected.

Beaminster

Gladman Homes

- The definition of Beaminster as a Tier 2 settlement is supported.

Beer Hackett

Thornhackett Parish Council

- Beer Hackett is rightly in Tier 4 but Policy DEV7 should not be applied to the detriment of existing residents.

Bere Regis

Wool Flora and Fauna

- Query why are Bere Regis housing sites not listed in Fig 2.6. Bere Regis is more sustainable than Wool, so why is it lower in the hierarchy?

Bridport

Gladman Homes

- The definition of Bridport as a Tier 2 settlement is supported.

Broadmayne

Chapman Lily Planning on behalf of Southern Strategic Land

- The identification of Broadmayne as a Tier 3 settlement is supported.

Burton Bradstock

Burton Bradstock Parish Council

- The retention of the Local Development Boundary at Burton Bradstock is supported on the basis that it is the only mechanism that could provide a pathway to securing affordable housing through an exception site.
- The view that Burton Bradstock can be considered a 'sustainable' location for residential development is challenged - residents are heavily dependent on Bridport for economic, social and cultural services. Without investment in transport services and infrastructure almost any residential development in the Parish will generate additional car journeys. Burton Bradstock needs affordable housing and investment in community infrastructure, in particular viable, accessible and frequent transport options for short journeys into Bridport.
- Identifying Burton Bradstock as a 'Sustainable Tier 3' village will encourage 'hope value', as current market conditions make the village is an attractive prospect for residential development due to the high property prices and a growing retirement population.
- Infill housing development within in the Local Defined Development Boundary will not help to meet local housing need. Past experience has shown that the sale prices of infill housing in Burton Bradstock is well beyond the reach of families earning average local incomes. As a Tier 3 Village, more infill development will be at prices that exclude any affordable provision.

Savills on behalf of The Trustees of MALF Pitt Rivers

- The classification of Burton Bradstock as a Tier 3 village is supported.

Charminster

Greenslade Taylor Hunt on behalf of Messrs J C, R I and M J Drake and Mrs S A Dean

- The inclusion of Charminster in Tier 3 of the settlement hierarchy is supported.

Chickerell

Pegasus Group on behalf of Persimmon / Persimmon Homes

- We welcome the identification of Chickerell as its own entity and as a Tier 2 settlement.

Public response

- It is not clear why Chickerell is either geographically or functionally not part of Weymouth.
- Chickerell shouldn't be classified as a town.

Child Okeford

Greenslade Taylor Hunt on behalf of Messrs J C, R I and M J Drake and Mrs S A Dean

- We have no objection to Child Okeford being classified as a larger (Tier 3) village, as it has a number of amenities and facilities.

Colehill / Wimborne

Cawdor Construction Developments Ltd

- Wimborne and Colehill's position within the settlement hierarchy is supported.

Colehill Parish Council

- Colehill and Wimborne are two distinct settlements with their own development needs and should be treated as such in the Local Plan. The Local Plan must treat Colehill as a separate settlement and recognise that it is not a town and has very little infrastructure.

Gladman Homes

- The definition of Wimborne Minster and Colehill as a Tier 2 settlement is supported.

Pegasus Group on behalf of Persimmon

- The amalgamation of Wimborne Minster and Colehill as a single settlement in the settlement hierarchy is welcomed, as the areas are linked both physically and functionally.

Persimmon Homes

- The identification of Wimborne Minster and Colehill as a single settlement is supported.

Public response

- Wimborne Minster / Colehill is rightly identified as being a Tier 2 settlement.

Cranborne

Public response

- Agree that Cranborne is defined as a Tier 3 village.

Gascoyne Estate

- Cranborne is a Tier 3 settlement, within the SE Dorset functional area, but located beyond the Green Belt. The Local Plan recognises that some allocations at some Tier 3 settlements are necessary, but none have been made at Cranborne, where development is limited to infill. This approach is not justified and Cranborne has been arbitrarily excluded from making a contribution to housing delivery. Two sites adjacent to the northern edge of Cranborne could provide c. 35 dwellings as described in the 'Cranborne Development Framework Statement' and as proposed as allocations in the draft East Dorset Local Plan.

Crossways / Moreton Station

Terence O'Rourke on behalf of Moreton Estate

- The identification of Crossways / Moreton Station as a Tier 3 Sustainable Village within the Central Dorset Functional Area is supported.
- It has appropriate facilities and accessibility, particularly given the presence of a railway station on a mainline to Poole Bournemouth, Southampton, Winchester and London, which is unusual for such a rural settlement. Dorset Council needs to make the most of this important asset.

Public response

- There is a lack of statistical evidence to inform identification of Crossways / Moreton Station as a Tier 3 village supporting growth in two functional areas, which the draft plan does not ascribe to any Tier 1 or 2 settlement.

Dorchester

North Dorchester Consortium

- We welcome the identification of Dorchester as a 'Large Built up Area' (Tier 1 in the settlement hierarchy), reflecting its important role as County Town in providing for sub-regional employment, housing and retail needs.

Pegasus Group on behalf of Persimmon

- We welcome the identification of Dorchester as a 'Large Built up Area' (Tier 1 in the settlement hierarchy). This reflects the important sub-regional role that Dorchester plays in providing for employment, housing and retail needs.

Persimmon Homes

- We welcome the identification of Dorchester as a 'Large Built up Area' (Tier 1), reflecting its role as the County Town.

Portland Town Council

- Dorchester is referenced as an employment centre but office-based working is likely to be cut back following Covid.

Furzehill

W H White Ltd

- Furzehill should be considered a Tier 3 settlement, rather than being included in Tier 4, due to the range of facilities and services at the village.

Leigh

Leigh Parish Council

- Agree with the categorisation of Leigh as a Tier 4 'smaller village'.

Litton Cheney

Litton Cheney Parish Council

- Tier 4 allocation is currently the most appropriate for this village. Some modest growth may be needed to maintain the vibrancy of the village. In future consultations, the Parish Council may wish to refine its response to this proposed policy.

Loders

Loders Parish Council

- There are concerns that Loders is identified within Tier 4, but does have a Defined Development Boundary, which allows for organic / incremental growth whilst maintaining the historic and linear character of the settlement.

Lytchett Matravers

Wyatt Homes

- The inclusion of Lytchett Matravers as a Tier 3 settlement is broadly supported. However, given its size, if the village was located in Western or Northern Dorset, it is likely that it would have been in Tier 2.

Lytchett Minster

Bloor Homes

- Allocating strategic development in the Lytchett Minster and Bere Farm area would require amendment to the hierarchy of settlements.

Marnhull

Savills on behalf of P and D Crocker

- We support the classification of Marnhull as a Tier 3 village.

Milton Abbas

Milton Abbas Parish Council

- Milton Abbas should not be classified as a Tier 3 village because it has a population of less than 500. 228 people live within the settlement boundary with 535 in the parish. It does not compare with the larger neighbouring Tier 3 village of Milborne St Andrew. It should be reclassified as a Tier 4 small village.
- The population of Milton Abbas looks much larger than it actually is, but this due to Milton Abbey School boarding pupils and staff being included in the population figures. The Abbey School children and staff should not be included in the population count for Milton Abbas. The school is not an integral part of the village.
- It is unclear where the population figure of 722 for Milton Abbas in the background paper came from. This does not align with Dorset Insight statistics. In 2018 it estimated 804 people and the 'usual residents in households' for the 2011 census was 565, excluding Milton Abbey school.

There are around 180-190 homes, with a 2.4 average occupancy rate would mean around 440-450 residents (i.e., below 500).

- Milton Abbas should not be classed as a large village as the infrastructure is not in place for larger numbers of people or cars. There is no public transport and very limited village facilities. It only has a post office, farm shop (no shop offering a range of food and non-food products such as a Lonsdale or SPAR) and a church for meetings, as there is no village hall. There is also no employment within the village.
- Milton Abbas should not be classified as a Tier 3 village because it is a very historic village, largely comprising an extensive Conservation Area, a Registered Park and Garden, and is within an Area of Outstanding Natural Beauty - all of which severely restrict options for further development.

Gleeson Strategic Land

- The identification of Milton Abbas as a Tier 3 settlement is supported, given its range of facilities and services.

Public response

- Milton Abbas should be classified as a small village, based on local amenities.
- Milton Abbas wouldn't cope with being labelled as a large village.

Pimperne

Turley on behalf of Wyatt Homes

- The inclusion of Pimperne within Tier 3 is supported, as it has good transport links and connectivity to Blandford Forum.
- Although Pimperne is in an AONB, it is not constrained by other environmental designations such as Habitats Sites, like much of the rest of South-East Dorset.

Puddletown

Turley on behalf of Wyatt Homes

- The inclusion of Puddletown within Tier 3 is supported, as it has good transport links and connectivity to Dorchester and is not constrained by environmental or landscape designations.

Sherborne

Sherborne Castle Estate

- We agree that Sherborne should be defined as a Tier 2 settlement.

Sixpenny Handley & Pentridge

Savills on behalf of The Trustees of MALF Pitt Rivers

- The classification of Sixpenny Handley as a Tier 3 village is supported.

Sixpenny Handley & Pentridge Parish Council

- Sixpenny Handley & Pentridge are excluded from any big development programmes and forego any support for future growth because Sixpenny Handley is defined as a Tier 3 village.

Stalbridge

Gladman Homes

- The definition of Stalbridge as a Tier 2 settlement is supported.

St Ives

Public response

- St Ives shouldn't be classified as a town.

Sturminster Marshall

Avison Young on behalf of Grasscroft

- We agree that Sturminster Marshall should be classified within Tier 3.

Chapman Lilly on behalf of the Brown Family

- We support the allocation of Sturminster Marshall in Tier 3 showing clear recognition of the strong sustainability credentials of this large village.

Sturminster Newton

Grassroots Planning on behalf of Land Value Alliances

- Strongly support Sturminster Newton's designation as a Tier 2 settlement.

Thornford

Thornhackett Parish Council

- We welcome the allocation of Thornford within Tier 3 where infill policies apply.

Upton

Turley on behalf of Wyatt Homes

- We support the approach in relation to Upton, that recognises this town as a part of the wider BCP conurbation with the highest levels of services, facilities, employment and connectivity in Dorset.

West Lulworth

Public response

- West Lulworth should be a Tier 4 village, rather than a Tier 3 village.
- Development would be unsustainable in West Lulworth.
- There are very poor transport / public transport links to the nearest town of Wareham. West Lulworth is not near an A road and a car journey to Wareham can take 20 mins due to traffic.
- In comparison, Winfrith Newburgh is in Tier 4 even though it is on an A road and it has better public transport links than West Lulworth.
- There are very limited services. The school is shared with Winfrith Newburgh and the store in the village is closed in winter, so residents have to drive to get supplies.

West Moors

Public response

- West Moors should not be classified as a town.

Weymouth

Bellway Homes Limited (Wessex)

- We support Weymouth being identified as a top-tier settlement.

Pegasus Group on behalf of Persimmon / Persimmon Homes

- The identification of Weymouth as a Tier 1 settlement is welcomed.

Winterborne Houghton

Winterborne Houghton Parish Council

- It is noted that the settlement hierarchy does not explicitly reference the village.

Woodlands

Woodlands Parish Council

- The hierarchical methodology begins to fail when applied to rural villages and hamlets, such as Woodlands, where homes for agricultural, forestry and other workers are found in outlying locations away from the main village.
- It is difficult to determine the population of such a village, where the community is dispersed beyond the existing hamlet or village, but ONS data shows that Woodlands parish has a population above 500 persistently.
- Woodlands has a range of facilities, including both a children's play area and a football pitch, a village hall, two churches, a restaurant and a bus service supported by the Parish Council giving access to shops and services.

3.2. Spatial strategy

Comments of support

Bradford Abbas Parish Council

- The strategy is supported.

Burton Bradstock Parish Council

- The spatial strategy is supported, in particular the focus on achieving a pattern for development that reduces the need for travel.

Lyme Regis Town Council

- We agree with the spatial strategy.

Symondsbury Parish Council

- The current approach as outlined in the current wording is supported.

Thornhackett Parish Council

- The housing distribution appears fair.

Southwestern Railway

- Agreement with the approach.

Dorset Climate Action Network

- The broad strategy for the allocation of development between the four functional areas and the two tiers of towns is endorsed, but only if subject to a radical reduction in the planned level of growth.

Developers/Landowners/Agents

- The Council's overall approach, which seeks to disperse housing growth across Dorset and at all levels of the settlement hierarchy, is supported.
- We agree with the approach of concentrating the main growth at the towns and larger settlements where communities, jobs and facilities already exist.
- Based on the information provided and the evidence base available, the distribution of development within the functional areas would appear reasonable.
- The distribution of housing between and within the functional areas is considered appropriate.

Public response

- The broad strategy of the emerging Dorset Local Plan to promote a sustainable pattern of development is supported.
- I broadly agree with the distribution of development between and within the functional areas.
- The allocation of housing land should be supported.

Comments of disagreement/objection

Town and Parish Councils

- All four functional areas should not operate under the same spatial strategy. Dorset Council should set out a policy framework that supports more sympathetic approaches to land use sustainability.
- There is little in the way of a meaningful spatial strategy that looks holistically at the county level or at the level of the functional areas.
- The spatial strategy section fails to properly describe or explain the proposed development in the Central Dorset area.
- The figures only reinforce the perception that little account has been taken of trying to develop a sustainable strategic pattern of growth.
- The approach appears to undermine the spatial strategy inherent in the plan, and if intended must be underpinned by monitoring and review of housing land supply.
- The Plan appears to be the result of the 'knitting together' of the previous draft plans.
- Creating growth in the functional areas to the east will have an effect on the sustainable development to the west of the County, but it is not clear how any balance has been addressed.
- The plan does not contain a list of alternative strategic options to trigger a meaningful discussion.
- Proposals from the draft local plans of the predecessor authorities appear to have been merely replicated.
- Just another business-as-usual developers' plan.
- Plan written in an aspirational manner - no solutions included to any problems.
- Concern that the plan essentially sees the world as it is and has been, and not how it is projected to be during the life of the plan.

Local environmental groups (non-statutory)

- Housing numbers should be drastically reduced and small settlements should be added to Dorset villages as this would help to support local businesses, shops, pubs, schools, and public transport.
- There is a concern that larger developments and increased strain on infrastructure will have environmental impacts, result in high land values, and fail to address local needs.
- There are concerns with increases in road traffic associated with development.

Bridport Area Neighbourhood Plan Group

- What happens in other functional areas in Dorset could impact upon the Western Dorset Functional Area.
- The outcomes will be dependent on the resolution of the 'Planning for the Future' housing white paper.

Dorset AONB team

- There is a clear risk that the scale of growth will be difficult to accommodate without adverse impacts on some sensitive areas.
- It may not be possible to deliver the housing growth proposed due to the significant environmental assets in Dorset.
- In view of the significant environmental assets in Dorset, the Council should not seek to meet unmet needs from neighbouring authorities.

Developers/Landowners/Agents

- Appropriate amounts of development (and sites for release from the Green Belt) should be identified at every level of the settlement hierarchy.
- The benefits of growth should be distributed proportionally across Dorset to deliver necessary infrastructure and community facilities, and to improve the sustainability of settlements.
- In addition to larger allocations housing growth should be directed to settlements that have good access to services and facilities.
- Whilst a focus on the main settlements is appropriate, there also needs to be a degree of pragmatism about expanding some of the villages and smaller towns, so that they can grow in an organic manner and become more self-sustaining and sustainable.
- The development strategy needs to be presented as the total level of change that is planned over the plan period, according to each functional area, settlement tier, and each settlement in the hierarchy.
- The housing and spatial distribution strategy in the draft plan will underdeliver, as the proposed housing delivery target is the minimum and the options for growth are highly limited in terms of number and scale, being limited to relatively few settlements across Tiers 1-3.
- Development strategy is unsound - needs an assessment of the role and function of each settlement, and how unconstrained it may be for development – to inform the settlement hierarchy and levels of growth.
- It is not clear whether all genuinely reasonable alternative options for growth have been considered by the Council.
- The plan needs to include detail on commitments as well as allocations in each functional area.
- Housing needs assessment will be fundamental in shaping the strategy and approach for growth in the period of the Local Plan.
- It is important to locate housing where there is housing need.

- A more refined understanding is needed on the requirements to support growth in the functional areas identified in the Local Plan.
- There is more scope to accommodate development in villages which are not already constrained by the Green Belt.
- Although the draft plan covers a geographically wide and predominantly rural area, the approach to housing should have a degree of local sensitivity.
- The plan should set out which specific uses would be considered appropriate within expanded settlements and whether specialist housing could be included.
- The Council's approach to site selection (underpinned by the Sustainability Appraisal and Green Belt assessment contains a number of worrying inconsistencies.

Public response

- Disagreement with the approach, which will impact on rural areas and result in urbanisation.
- The split of housing numbers across the functional areas do not reflect existing dwelling numbers and population.
- Urban spread will impact on the existing population - increased densification for local people.
- Growth will result in urban sprawl and the merging of villages.
- I am concerned with the lack of housing allocations across the vast majority of Dorset.
- Allocations should include a significant number of smaller sites.
- There is no information to explain the distribution of housing between functional areas and settlements. Clarification is required.
- There is a lack of justification for the spatial strategy. The strategy does not look at Dorset holistically, instead it knits together previous plans – need for full re-examination.
- The approach of the spatial strategy is contrary to paragraph 62(b) of the NPPF, which speaks of creating mixed and balanced communities.
- The draft plan has not applied clear, unambiguous, sequential, risk-based approaches to the allocation of land.
- The draft plan has been put together looking at available land around the County, rather than looking strategically at where it makes sense to develop - will result in a poor distribution of development.
- The Central Dorset Functional Area (FA) (incorporating the Western Dorset FA) is likely to increasingly be populated by retired people whilst the Eastern FA and the North Western FA (as proposed in this submission) are likely to thrive on the growth of the conurbation and Yeovil respectively, driven by the adoption of new technology.
- The plan will create very homogenous communities of people from the same social-economic groupings from which local people are excluded by virtue of economics.
- To prevent towns becoming overwhelmed, it would be better to spread a smaller number of infill houses into many villages and town boundaries.
- The Local Plan should include a strategy for supporting rural communities and market towns which does not rely on large-scale housing allocations.
- The spatial strategy needs to consider the impacts of increased home working and a reduction in commuting for work.
- A long term strategy is needed, which should be both universal and specific dealing with inequalities in age, gender, regional and inter-regional education and health.
- A sustainable strategy focussing on people walking to shops, schools and entertainment is utopian and unrealistic.

- There is little evidence that an appropriate balance between homes and employment is being achieved. Although there may be high levels of house building, there are also low rates of job creation and problems of a low wage economy across the County.
- The plan creates a never ending spiral that means mass building at the expense of quality of life. If more homes are built, then more people will move here and there will be a demand for jobs, with yet more demand for houses etc.
- There is no mechanism to keep building to a sustainable level, resulting in some areas seeing considerable growth and others little or none for many years.
- The proposals in the plan will destroy the appeal of the area to tourists who wish to see a traditional rural Dorset.
- The proposed increase in housing does not take into consideration the changes to retail, which is rapidly reducing, thereby allowing the conversion of retail in towns to housing.
- The Local Plan promotes short-term profit for the construction industry.
- This level of development is about delivering profits for housebuilders and is not about meeting the needs of local communities.
- The housing target is unrealistic due to the increasing cost of building materials, particularly from overseas, which will have a significant impact on construction costs and the market price of new homes.
- Suggests a co-ordinated approach to enhancing sustainability (referencing land use, agriculture, generating renewable energy, sustainable construction/design, making most of existing places and 'celebrating brownfield development').
- Respondent suggests that the local plan allocations should maximise use of brownfield land and is concerned that this does not have more prominence.
- Potential for towns such as Bridport to be sustainable models for Eco-Towns.
- Dorset Council should re-assess its approach to housing allocations - seeking to avoid harm rather than mitigate/compensate for harm.
- New development should be focused on town centres.

Paragraph 2.3.1

Local Environmental Groups (non-statutory)

- There should be a statement of opportunities rather than constraints of the natural environment for health, economy, and the forthcoming Local Nature Recovery Strategy.

Natural England

- The list of potential environmental constraints that should be taken into account in the development of the spatial strategy should include: priority habitats; protected species; and land included in the Dorset ecological network.
- The plan should include a definition of 'Habitats Sites'.

Paragraph 2.3.5

Public response

- Paragraph 2.3.5 talks about housing sites (in the supply), which 'are likely to be economically viable'. This should be modified to say 'and that are likely to be economically viable considering all economic aspects including the need for enhanced infrastructure such as increased public transport to the nearest larger towns, the provision of schools for the increased population, and

the provision of food shopping facilities. These developments will take due consideration of AONBs and other recognised conservation areas.'

Paragraph 2.3.10

Public response

- In paragraph 2.3.10 the existing wording 'has been derived from the review of the hierarchies in existing adopted local plans for the former Boroughs and Districts' should be modified to 'will be derived from the review of the hierarchies in existing local plans and neighbourhood development plans (NDPs) where the NDP shows a publicly documented advanced state of local consultation, for the former Boroughs and Districts'. This is necessary to align with the Local Plan's objectives as set out in Section 1 and in particular paragraphs 1.1.2, 1.1.3 and 1.1.4.

Paragraph 2.4.10

Local Environmental Groups (non-statutory)

- It should be stated that some brownfield sites have 'high-quality diversity', which should be taken into account when determining the use of brownfield sites.

Paragraph 2.4.11

Dorset Wildlife Trust

- Some 'brownfield' sites can support high biodiversity interest. Paragraph 2.4.11 should be amended to reflect this.

Local Environmental Groups (non-statutory)

- This paragraph is supported.

Housing supply / delivery

Natural England

- Sites in the housing supply should be sites that are available and suitable for 'sustainable' development.

Developers/Landowners/Agents

- There are housing land supply issues in each of the former District Council areas, suggesting that current housing policies are out-of-date.
- The Council should confirm whether 10% of the housing requirement will be delivered on small and medium sized sites.
- We note that the 5-year housing land supply is based on the proposed housing requirement.
- The emerging local plan does not include a housing trajectory as required by national policy.
- Given the reliance on smaller sites, they should come forward where within or adjacent to Tier 1, Tier 2 or Tier 3 settlements, whether they be allocated sites, windfall development or infilling within existing settlement boundaries.
- The Council should consider releasing a number of self-contained sites adjoining existing settlements where there is the potential for managed future growth taking full account of the need for sites to be developable, in line with national policy.

Public response

- The proposed housing and spatial strategies look certain to underdeliver as the delivery target is the minimum and the options for growth are highly limited in terms of the number and scale of allocations.

In-migration

Dorset Action: on behalf of the Local Plan's people's assemblies in early 2021

- Migration to Dorset is an historic issue that creates a need for more housing, but if new housing is taken up by in-migrants, then the housing needs of local people may not be met.

The needs of the elderly

Lyme Regis Town Council

- The older age profile places particular demands on services aimed at supporting the elderly. Given Lyme's remote location and relative inaccessibility, this emphasises the importance of ensuring that these services continue to be supported and delivered locally.

Somerston Development Projects Ltd

- The spatial strategy is unsound as elderly people with care needs are not considered.

Development at larger (Tier 1 and 2) settlements

Charminster Parish Council

- We are concerned with the spatial strategy for development because the focus on fewer settlements with more services, misses the importance of ensuring that the whole of Dorset is sustainable.

Chideock Parish Council

- There is concern with the focus on new development at existing larger towns, thereby ignoring west Dorset.
- Large-scale business parks at Tier 1 or 2 settlements should not be the only job opportunities. New businesses, social housing, and local infrastructure should be encouraged throughout the county, just in Tier 1 and 2 settlements.

Crossways Parish Council

- The most sustainable locations for new homes are around the larger settlements including Dorchester, Weymouth & Portland and Sherborne.

Public response

- The majority of development should be shared between existing urban areas which already have good transport links, shopping, health, education and other facilities - rather than at small communities where these facilities do not exist or require massive investment to provide them at the required level.

Development at larger (Tier 3) villages

Developers/Landowners/Agents

The need for growth at Tier 3 villages

- The strategy should encompass a need for development in rural areas with some growth at smaller scale settlements, such as Tier 3 villages - allow them to be re-categorised as Tier 2 / Tier 1 settlements over time.
 - Growth at smaller villages would maintain the vitality of rural areas - especially in the light of: smaller and decreasing household sizes; an ageing population; and the need for in-migration to replace young people leaving the area.
 - It is vital that not all Tier 3 villages are assigned the same level of growth.
 - Villages need to be able to grow both for the betterment of the existing population who may wish to downsize, upsize, or get onto the housing ladder for the first time.
 - Smaller settlements require growth to allow services to remain and expand, and make alternative transport options more feasible.
 - Dorset Council should identify suitable land allocations for development at all Tier 3 settlements so they can grow and retain their 'hub' status for surrounding rural areas. If only rural exception affordable housing and essential worker housing are permitted in the countryside and at Tier 4 settlements, any general housing need that arises would need to be met at the Tier 3 settlements.
 - Allocations are needed in Tier 3 settlements to allow young people to move there and to counteract the problem of an ageing population. Without allocations, it will not be possible to have Help to Buy schemes in villages.
-

Clarification on the strategy

- Paragraph 2.3.14 states that Tier 3 settlements will be subject to infilling, even though some Tier 3 settlements have larger allocations. This seems contradictory and the approach to meeting development needs is not explained until paragraph 2.4.3. For clarity this approach should be explained when the tiers are defined in the preceding section.
-

Sustainability

- The approach fails to appreciate the sustainability credentials of Tier 3 villages.
-

Site delivery/viability

- Small sites at smaller villages can be delivered at a faster rate than larger allocated sites, making an important contribution to the Council's five-year housing land supply. Further allocations should be considered so that the Council can continuously maintain a healthy and constant supply of deliverable sites.
- Infill development provides no certainty that new homes will come forward to sustain the population and local facilities.
- Dorset Council should not rely on Neighbourhood Plans to deliver housing at Tier 3 settlements, as there is no requirement for examination inspectors to examine and investigate the deliverability of allocated sites, thereby increasing the likelihood that sites will not come forward as intended.
- Development in these villages is often desirable from the perspective of the developer and prospective purchaser as it can achieve short term delivery and provide affordable housing and other contributions. There are also fewer concerns over viability.

- Neighbourhood plans tend to focus on addressing immediate housing needs and not needs of the surrounding area. If each Tier 3 settlement only addresses its 'own' identified local needs, the need that arises in Tier 4 settlements will not be met.

Inconsistency with National Policy

- Growth at smaller villages will help to maintain and enhance economic vitality and maintain village services and facilities, as envisaged by paragraph 78 of the NPPF.
- Only allocating development at five Tier 3 settlements, has not properly identified such opportunities and is inconsistent with national policy.
- The ability for lower tier settlements to provide additional housing growth has not been fully assessed.

Inconsistency with previous Local Plans

- The 'rationalisation' of the settlement hierarchies in the former districts has had no regard to the strategies for lower tier settlements in previous plans (including the emerging Local Plan for the former East Dorset).

The role of Tier 3 settlements

- The Council should consider making allocations around lower order settlements which have an important role (specifically providing essential services / facilities and contributing to vitality / viability of these communities) in the 'rural hinterland'.
- The role and significance of the larger villages in Tier 3 could change significantly to meet the long term and strategic needs of a larger housing requirement across the plan area.

Comments in respect of specific settlements

- The plan needs to be more aspirational and recognise the individual and accumulative benefits of small scale village growth, for example at Child Okeford.
- The Council are considering development at Tier 3 settlements including Moreton / Crossways, Wool and Alderholt for larger-scale development as these have comparably fewer constraints when considered against other settlements but instead have significant landscape and ecological constraints and this does not off-set the fact that major settlements need to accommodate the majority of growth.
- The draft Local Plan fails to recognise the important role that relatively small-scale sites on the edge of villages, such as Burton Bradstock and Sixpenny Handley, can make to the vitality of the rural communities as well as the contribution they make to longer term sustainable growth across the plan area.
- The Council should be planning for more small / medium allocations at Tier 3 settlements across the plan area including at Burton Bradstock, Sixpenny Handley, and a smaller allocation of land at Bere Regis.
- Draft Local Plan fails to recognise the important role that relatively small-scale sites on the edge of villages, such as Marnhull, can make to the vitality of the rural communities as well as the contribution they make to longer term sustainable growth across the plan area.
- The Council should consider a greater distribution of small / medium-sized allocations across more Tier 3 settlements, including at Marnhull.

Public response

- There is only limited consideration of development at villages in the plan. Contrary to what the plan says, villages can be sustainable locations due to home working.

- Many villages have the ability to accommodate housing growth, but have limited opportunities within their settlement boundaries.
- The plan should make small additions to villages with good access to bus / train routes as this would have less impact on the countryside.

Development at smaller (Tier 4) villages

Arne Parish Council

- The approach ignores the needs of smaller villages, where housing is needed to provide for local 'low cost' housing and to maintain existing infrastructure and services.

Chideock Parish Council

- Villages classified as 'unsustainable' because they do not have a doctors surgery etc. should not be dismissed out of hand.

Puddletown Area Parish Council

- There may be instances where appropriate development should be supported in settlements ranked as Tier 4.

Developers/Landowners/Agents

- Growth at smaller villages would maintain the vitality of rural areas.
- Small sites at smaller villages can be delivered at a faster rate than larger allocated sites, making an important contribution to the Council's five-year housing land supply. Further allocations should be considered so that the Council can continuously maintain a healthy and constant supply of deliverable sites.
- Growth at smaller villages will help to maintain and enhance economic vitality and maintain village services and facilities, as envisaged by paragraph 78 of the NPPF.
- The ability for lower tier settlements to provide additional housing growth has not been fully assessed.
- The Council should consider making allocations around lower order settlements which have an important role (specifically providing essential services / facilities and contributing to vitality / viability of these communities) in the 'rural hinterland'.
- The development strategy should support growth in lower order settlements that would allow them to be re-categorised as Tier 2 / Tier 1 settlements over time.
- The approach fails to appreciate the sustainability credentials of villages outside the top three tiers. Small villages need to be able to evolve and grow (as advocated in paragraphs 78 and 79 of the NPPF) both for the betterment of the existing population who may wish to downsize, upsize, or get onto the housing ladder for the first time.
- Without some development in small villages, younger generations are displaced and the older generations are effectively trapped in accommodation that no longer serves their needs. Some new blood and diversity should be allowed into small villages, creating richer and more vibrant communities as well as supporting existing facilities and establishing new ones.
- Development in these smaller villages is often desirable from the perspective of the developer and prospective purchaser offering short-term delivery, affordable housing provision and other contributions with fewer concerns over viability.

Public response

- Limiting development in small villages is supported because of the lack of infrastructure and the unsuitability of narrow Dorset lanes for increased transport; the sensitivity of the Dorset AONB

to erosion; the risk of isolation of the elderly and infirm in the absence of transport links; and the lack of suitability of such locations for affordable homes given very limited local opportunities for employment.

- Emphasis must be placed on maintaining the character of Dorset's small villages and not turning parts of Dorset into urban sprawl.
- Limiting development to within boundaries set by Neighbourhood Plans of Tier 4 villages is highly appropriate.
- The settlement hierarchy approach fails to appreciate the sustainability credentials of villages outside of the top three tiers, which need to be able to evolve and grow both for the betterment of the existing and future population.
- There is only limited consideration of development at villages in the plan. Contrary to what the plan says, villages can be sustainable locations due to home working.
- Many villages have the ability to accommodate housing growth, but have no development boundary or have limited opportunities within their settlement boundaries.
- It is important that smaller settlements in Dorset are expanded to cater for any population growth, and to preclude the drift to the BCP conurbation, which in turn puts pressure on to the release of Green Belt land.

Development in Southeastern Dorset

Colehill Parish Council

- Housing provision in the draft Local Plan is focused too heavily on East Dorset. Of the 11,195 houses proposed, the majority are in South East Dorset, which is already significantly more developed than the rest of Dorset.

Dorset Climate Action Network

- The proposal to concentrate much of the growth in Central and South East Dorset will pile further pressure on the on already pressured infrastructure.
- The level of development proposed in Central and South East Dorset conflicts with Government policy to protect areas of high environmental quality and the Green Belt. Numbers should be reduced, primarily to ease the pressure on these areas and to remove the need to breach the Green Belt.

Developers/Landowners/Agents

- The distribution of development in South East Dorset is overly weighted towards less sustainable, 'outlying' settlements. A greater focus should be at strategic locations near the South East Dorset urban area.
- Dorset Council's approach of setting out 'firm' plan proposals for South East Dorset is premature without knowing BCP Council's requirements.
- Housing should not be focused on just main towns and (in the Central and South East Dorset areas) at just five Tier 3 settlements, as this will risk poor housing delivery in the future. More small-scale allocations at Tier 3 settlements should be made.
- It would not be appropriate to accommodate needs relating to the BCP conurbation elsewhere in the plan area.
- South Eastern Dorset where the Green Belt is located is likely to be the area with the greatest need for housing as it is close to the BCP conurbation, and therefore the most sustainable area for development.

- It is important to ensure that sufficient planned housing development is distributed to the South East Dorset functional area. Although there are constraints, this has the highest population of the four areas. Housing need generated by the economic activity focused on the BCP conurbation is most acutely expressed within this area.
- It is important to allocate housing to the South East Dorset functional area. Although constrained, it is the area where housing need is highest and where development will contribute to sustainable travel patterns.
- General support for directing growth within South Eastern Dorset and Blandford.
- Additional allocations at the Tier 2 settlements beyond the Green Belt and especially at Blandford Forum should be considered first before releasing Green Belt land. Increased growth at Blandford would help contribute to meeting the needs of this part of the functional area and would be a more sustainable option.

Public response

- It is logical to devote the bulk of the housing and employment growth to the South Eastern Dorset Functional Area, rather than to the smaller and by comparison rather inconsequential Central Dorset Functional Area.
- The housing and employment allocations are disproportionately skewed towards the South East Dorset functional area. Housing allocations in South East Dorset total 4,740 new houses (excluding options at Alderholt) out of a total of c. 11,500 new homes proposed.
- The South Eastern Dorset Functional Area has all the attributes to be successful in a future dominated by automation and the training and skills needed to compete with artificial intelligence etc.
- The suburbs around the BCP conurbation will need to grow to accommodate the people who migrate to the conurbation to obtain work, as automation takes over jobs elsewhere in the Dorset Council area particularly, Dorchester.
- The Plan needs a rethink to spread the developments around Dorset and not to put the majority in South East Dorset, as in the draft plan Dorset's population and housing / industry are skewed towards BCP.

Development in Central Dorset

Dorset Climate Action Network

- The proposal to concentrate much of the growth in Central and South East Dorset will pile further pressure on the on already pressured infrastructure.
- The level of development proposed in Central and South East Dorset conflicts with Government policy to protect areas of high environmental quality and the Green Belt. Numbers should be reduced, primarily to ease the pressure on these areas and to remove the need to breach the Green Belt.

Developers/Landowners/Agents

- Due to the environmental constraints in the Central Dorset area, (for example the AONB, areas liable to flooding etc) it is necessary to maximise the development potential in those areas which are least constrained, or where development can be delivered without any overriding harm to these constraints.
- Housing should not be focused on just main towns and (in the Central and South East Dorset areas) at just five Tier 3 settlements, as this will risk poor housing delivery in the future. More small-scale allocations at Tier 3 settlements should be made.

- Substantial growth within Central Dorset will only see an increase in outward migration from the services in the conurbation.

Public response

- Within a few years the large allocations in the Central Dorset Functional Area will seem anachronistic, as the conurbation and South Eastern Functional Area surges ahead in terms of growth.
- Allocated sites in the Central Dorset Functional Area are less sustainable than in the South Eastern Functional Area due to lack of employment proposed in the area.

Development in Northern Dorset

Developers/Landowners/Agents

- No housing land allocations in any north Dorset villages - promotion of land at Frizzell's Hill - could amend village envelope to allow for smaller sites in acceptable locations.
- Some growth should be located within the more rural parts of Northern Dorset including at smaller scale settlements, such as Tier 3 villages, which would help to maintain the vitality of rural areas.

Public response

- Allocated sites in the Northern Dorset Functional Area are less sustainable than in the South Eastern Functional Area due to lack of employment proposed in the area.
- The strategy for growth in Northern Dorset should take account of the function and role of settlements in neighbouring areas, especially Yeovil.

Development in Western Dorset

Savills on behalf of Hallam Land Management Ltd.

- The number of allocations (1,469 units) in the draft plan directed towards the Western Dorset functional area is just 5% of the total, which is a very small amount.
- The housing growth proposed in the Western Dorset functional area is inadequate and this should be addressed through additional allocations at Lyme Regis.
- Although 1,064 homes have already been consented in the Western Dorset functional area, these are mostly at Vearse Farm, Bridport. The shortfall in provision in the functional area is having a disproportionate impact on the other Tier 2 settlements due to the current distribution.

Public response

- The distribution of proposed housing is unfair. West Dorset seems to have been allocated very little compared to East Dorset.
- Expectations on the capacity of the Western Dorset Functional Area to absorb significant new development should be proportionate.
- There is more space for development to the west of the county.
- Allocated sites in the Western Dorset Functional Area are less sustainable than in the South Eastern Functional Area due to lack of employment proposed in the area.
- There should be a Western Dorset Functional Area covering Weymouth, Dorchester, and Bridport. It is illogical to have a housing market area centred on Bridport, as Dorchester has a strong influence on the town.

Defined development boundaries

Pegasus Group on behalf of Persimmon

- Different terminology for the naming of Local Plan and Neighbourhood Plan development boundaries is not necessary. There are other policies in the plan (and in Neighbourhood Plans) that will ensure that development at settlements is proportionate to the settlement.
- There is a danger that the introduction of different terminology may lead to confusion for decision-makers when it comes to the application of policies in the plan, notably policies DEV2 to DEV6 (and potentially other policies).
- Settlement boundaries should be simply referred to as Development Boundaries.

Winterborne Houghton Parish Council

- We would welcome more 'forceful guidance' around resisting development outside defined development boundaries.

Public response

- Many villages have the ability to accommodate housing growth, but either have no development boundary or have limited opportunities within their settlement boundaries.

The need for 'balanced growth'

Public response

- There is a need for balanced growth across Dorset, including the use of brownfield land, regeneration and the balanced growth of large historic settlements, and growth to sustain rural communities and their facilities.
- The plan should avoid an unbalanced, almost wholly Dorchester centric spatial strategy. It should consolidate the sustainability of all existing settlements, including smaller rural communities.

Brownfield land / town centre regeneration

Natural England

- The use of the brownfield register to identify potentially suitable development sites, is supported. However, the Local Plan needs to be mindful of the potential wildlife and recreational value of some brownfield sites. This is recognised in paragraph 117 of the NPPF, which seeks to avoid harm to biodiversity on brownfield sites. A similar safeguard should be incorporated into the Local Plan, which should include the protection of land classified as open mosaic on previously developed land, which is a priority habitat.

Arne Parish Council

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

Dorchester Town Council

- An alternative approach would be to look at higher densities in town centres.
- In particular, there is considerable potential in Dorchester for town centre housing.
- Dorset Council should invest time and resources into masterplanning the regeneration of Dorchester town centre.

West Dorset Conservative Association

- The draft Plan fails to emphasise the use of brownfield sites and the re-purposing of existing buildings to minimise greenfield development. There are opportunities to do this as a result in the changes in demand for retail and commercial space in town centres. Re-purposing empty retail spaces in town centres will help restore life to town centres.

Inspired Villages

- The spatial strategy should be amended to acknowledge the contribution of previously developed land such as at Matchams Stadium to ensure consistency with national policy.

Pegasus Group on behalf of Persimmon

- Policies do not support the prioritisation and redevelopment of brownfield land. Additional criteria should be added to support the development of appropriate brownfield land (as well as buildings).

Public response

- The spatial strategy should factor in the capacity of each settlement to absorb sustainable growth, especially its infrastructure, road network and public transport services.
- We need to think about new opportunities for people to live in county towns and shopping streets, enabling walking and cycling to work or leisure.
- The Council should prioritise meeting development needs on previously developed land and should strengthen the protection of the Green Belt.
- The use of brownfield sites is supported, but the potential loss of wildlife habitats (e.g., bat and swallow roosts) on such sites must be considered.
- The very large areas of development proposed in the draft plan have not been justified, as there is no discussion of developing on brownfield land and re-purposing existing buildings.
- There should be town-focused development, where growth would be delivered within existing urban areas, re-using brownfield land, and increasing the density of development where appropriate.
- Existing buildings could be upcycled and renovated for new homes and unused retail units could be used for town centre housing, especially low-cost housing. A 'call' for such buildings is needed.
- Higher-density mixed-use development within existing built-up areas, could create vibrant communities and economic development could be met without destroying Dorset's precious natural capital.
- Brownfield land will become available for development because of changing working practice triggered by the Covid-19 pandemic / growth in online shopping.
- There are many empty buildings and shops etc. in Dorset. Extensive research needs to be conducted to use these buildings in the most efficient manner.
- A feasibility study should be undertaken to identify brownfield sites and empty commercial buildings suitable for development before any large-scale development on greenspace and floodplains takes place.
- Increased home working and operating online may affect new build premises.

Rural areas

Chideock Parish Council

- The plan will make rural areas more remote, escalating social isolation and loneliness.

Holwell Parish Council

- There are issues of social isolation, disconnection and loneliness for people living in rural areas, including Holwell.

AAH on behalf of Land Allocations Ltd

- The strategy should encompass a need for development in rural areas, where some growth should be located.

Gleeson Strategic Land

- Limiting development in the rural area, does not always minimise the need to travel since allocating homes in villages can help support the services that are available in villages for the benefit of the existing and new population, to ensure the overall need to travel can be minimised. The need to travel has already reduce following the COVID-19 pandemic with working from home and shopping moving online.

Public response

- Rural settlements are dying due to a lack of investment and the loss of services, such as transport, shops, doctors etc.
- Restricting development in rural areas will result in rising house prices.
- The draft plan maintains and enhances the rural lifestyle by making almost all of its allocations in towns, shunning development in villages.
- The draft plan neglects rural areas, pushing everyone to be clustered in towns and urban conurbations because they are easier to service.
- It is a false argument to suggest that protecting the countryside blocks rural building development.
- Housing growth is not sustainable in rural areas due to the lack of jobs and unsustainable travel patterns.
- Outlying settlements, with less sustainable connections, should not be required to accommodate the level of growth that more sustainable locations can.
- Poor quality development is having a harmful impact on the character of rural settlements.
- The Local Plan should include a strategy for supporting rural communities and market towns which does not rely on large-scale housing allocations.

A more dispersed pattern of development

Town and Parish Councils

- There should be a reduction in housing numbers and the potential to disperse development amongst areas where Neighbourhood Plans would indicate suitable numbers and location.
- Villages and smaller settlements need development to keep the shop, school and bus service etc. going, and to ensure that we have living not dying communities. All areas should have limited development proportional to their existing size.
- The proposed housing allocations should be spread more equitably across Dorset to reflect changes in working patterns as a result of the Covid-19 pandemic and the likelihood that more people will want to live in more rural areas of Dorset in the future.

Chris Loder MP

- The Plan constitutes a shift away from village life in favour of urban life by centralising housing in town extensions. This enables developers to profit, rather than providing modest village

developments. This approach will mean that bus services will not be viable and villages will become more isolated.

- The Plan should pursue an inclusive option covering the whole area, not just the large towns, which will make the Local Plan compliant to a Dorset National Park proposal with its many losses and negative effects to our local community.

Dorset Climate Action Network

- Small elements of new development at smaller towns and villages, if rooted in true local need, can greatly assist the viability of these settlements. We wish to see modest levels of development in the villages.

Dorset Action: on behalf of the Local Plan's people's assemblies in early 2021

- Housing needs should be met with more of a spread of development around the smaller towns and villages, which appear to have been discounted.
- Some participants felt that the rejection of development around smaller towns and villages may come back to the implementation of development boundaries at an earlier time, although others questioned whether it was a good idea to use the land around villages for housing, employment and community facilities.

Sherborne and District Society CPRE

- All villages with a school should have a small allocation and all other villages should be closely examined. We advocate some housing allocations, but with communities' agreement, e.g., through neighbourhood plans.
- We suggest that there should be caps on development. Firstly, the size of each development should be fixed at 2.5% of the households in the village. Secondly, the cumulative amount of development in a village in the Plan period should be no more than a 5% gain on households.

West Dorset Conservative Association

- A more distributed plan of development is required to reduce the need for travel, but to prevent the decline of local services and employment in smaller towns and villages.

Alder King on behalf of Wessex Strategic

- The spatial strategy of the local plan for the former North Dorset area, which focussed on the main towns and settlements in the District, was not successful and led to speculative applications putting pressure on rural services.
- An alternative strategy is required where growth is more evenly distributed at all tiers of the settlement hierarchy, which would place less pressure on those larger sites.
- As part of this approach, Tier 3 villages should be considered sustainable, as growth here would help to resolve issues of an ageing population and would help to safeguard and improve the long term viability and vitality of smaller local communities.
- More sites allocated across smaller sites may also mean that the release of Green Belt land is not necessary.

Public response

- There is no mention of online shopping and the ability for people to live away from towns and yet still access almost all the goods they require.
- The plan does not take account of the increased demand for rural properties as a result of increased working from home during the pandemic, which will continue in the future.

- There is a need to develop and maintain more sustainable rural communities through locally relevant employment and housing growth strategies.
- Development should be focused on sustainable key rural villages as well as the towns.
- Rather than creating conurbations as satellites to existing employment centres, there is an opportunity to invigorate small village communities through small-scale growth.
- Development should be spread more widely in small villages throughout Dorset to help sustain rural communities and to keep villages thriving.
- A far better relationship between allocated housing, employment land and functional areas would be achieved by making allocations across Dorset's numerous villages.
- Immediate housing need should be met by clusters of character homes in satellite villages to help retain infrastructure in villages.
- Every settlement should be allowed to grow at a regional growth rate and generate sustainable communities.
- Housing increases should be spread across Dorset, proportionate to the local populations.
- The plan should recognise the individual and accumulative benefits of small-scale village growth, for example at Longburton.
- By having more diffused settlements, there would be less pressure to release Green Belt land.
- Gradual and dispersed development would enable the use of local builders.

Environmental impacts

Nexus Planning on behalf of Hallam Land Management

- Dorset's environmental constraints, notably AONBs, Special Protection Areas (SPAs) and Green Belt (and the rural nature of much of the plan area), mean that it is challenging for its development needs to be met in full in a sustainable manner.

Puddletown Area Parish Council

- The local plan should aspire to deliver further housing without damaging Dorset's landscape, heritage and rural character.

Public response

- The environment is Dorset's greatest asset and the key to the future health and prosperity of residents.
- Not enough weight is given to the Green Belt, AONBs, the environment, wildlife, protected areas and heritage sites.
- The UK should retain the best agricultural land to produce food.
- Buffer areas should be introduced around protected sites like the World Heritage Site and the many smaller sites in the AONB.

Dorset AONB

Milborne St Andrews Parish Council

- AONB boundaries should be reviewed. Milborne St Andrew lies outside the AONB, but is arguably of equal landscape quality to the areas within the AONB. The area is potentially undervalued, even though it enjoys a wealth of heritage and cultural associations as well as attractive landscapes.

Public response

- Do not build large developments in AONBs, develop brownfield land instead.

- The AONB does not have to be an automatic bar to sensitive development.

Employment and jobs

Town and Parish Councils

- Employing locally will help reduce the number of hours lost travelling and the pollution caused by car use for travel to work.
- Respondent considers that the local plan should be clear how employment opportunities will be created and travel opportunities provided.
- There is a significant range in growth across the area, but a lack of meaningful links to job growth across settlements in Dorset, in the absence of a more refined analysis of need. There is no explanation why some settlements are seeing significant population growth and very little employment growth, and some the opposite.
- The level of jobs relative to population growth is imbalanced, with the greatest proportionate job increase focused on the South-Eastern Dorset functional area, whilst Central Dorset sees the least proportionate increase compared to its housing growth.
- Portland / Weymouth / Dorchester are in a growth corridor and should be referred to as such.

Public response

- There are mainly low income jobs in Dorset and there is a gap between rich and poor, wealth and income.
- Clarification is required around the need for employment land and further detail should be provided on the method for calculating the need for employment land.
- There needs to be a clear idea of the likely employment locations for large new developments. The draft plan is currently unclear.
- Large industrial units are unlikely to attract commercial interest to more rural areas due to the poor transport network. Smaller units within the community and possibly live / work units are needed in this changed and changing situation.
- Working from home drives internet connectivity which provides rural employment.
- The strategy for delivering employment sites with residential is not working.
- Where is the vision for improving training for our young people so they can have better paid jobs and careers here in Dorset?
- Low paid seasonal work is no longer acceptable or sustainable as our main economic base.
- Where are the jobs for additional population?
- Importance of people having purposeful, meaningful work that they enjoy.
- The Plan needs a new sub-section and policy on rural enterprise and innovation. This goes beyond agriculture, to include health and well-being, food, tourism and other activities, not least legacy – because the countryside does not manage itself.

Tourism

Char Valley Parish Council

- All applications for further tourist development should be more rigorously assessed in terms of their impact (including their cumulative impact) on local infrastructure particularly roads and drainage.

Infrastructure

Town and Parish Councils

- Some of the proposed developments would be 'stuck out on a limb' without the supporting infrastructure or a sense of community.
- There is a lack of infrastructure and connectivity for phones and the internet in rural areas.
- Some facilities in villages may not be sustained. It is important that the underpinning evidence considers the likelihood of such changes and sets out a clear strategy for their re-provisioning, if needed.
- The Council's development strategy should take account of local infrastructure.

Dorset Climate Action Network

- Additional housing on the edge of towns will have an impact on existing infrastructure. Due to these infrastructure pressures, residents would have to travel further to work and access services.
- A stronger emphasis is needed on the provision of local services within new housing estates and the requirement to meet the cost of new infrastructure through planning agreements and the Community Infrastructure Levy (CIL).

Public response

- New homes should not all be built in large housing estates on the edge of existing towns, as they will place more pressure on infrastructure.
- Building onto existing settlements is parasitic on existing communities. Infrastructure is already highly strained and any further additions of housing will have a seriously detrimental effect on the quality of life of both existing and new residents.

Transport and travel

Town and Parish Councils

- Residents increasingly do not want to have to rely on their own transport to meet the needs of everyday living.
- There is no mention of extending the bus or train services for rural areas, which can only lead to increased car usage.
- The level of commuting to South East Dorset for jobs will increase. According to a recent study based on 2011 Census data, jobs within the Poole and Purbeck areas already account for the largest net out-commuting from West Dorset.
- There is a lack of transport links in rural areas.
- The nature of work is changing but these changes have not filtered through to the plan. Commuting linked to manufacturing / industrial work will continue more or less unchanged.

Chris Loder MP

- The issues of transport connectivity discussed early in the Plan are not addressed. This is compounded by centralising housing in town extensions rather than dispersing it across the whole area. Transport issues need to be considered at the earliest stages of plan making and more detail on this is needed.

Purbeck Transport Action Group

- There is a need for coordinated action to alleviate the problems of congestion in Purbeck, with its consequences for public safety and the environment.

Terence O'Rourke on behalf of Pennyfarthing Homes

- The spatial strategy needs to consider the transport network.
- Locating new development in sustainable locations will solve part of the problem but does not impact existing residents who may live in less accessible locations.
- The spatial strategy needs to consider the needs of the road network and how it needs to adapt over the plan period specifically to the electric car.
- There is a need for the provision of fast charging points and opportunities to take a break from driving, to meet the needs of commuters.
- Policy should embrace evolving car technology, looking at the strategic network to determine appropriate locations for Road Service Areas.

Turley on behalf of Wyatt Homes

- It is important to create sustainable travel patterns.

Public response

- New homes should be located in order to allow residents to access services / facilities without using a private vehicle.
- The definition of areas suitable for development is contested as much of the population lives within a 15 minute drive of a town.
- The draft plan should not prioritise a 15-minute car journey. It needs to create viable alternatives to the private car, not encourage greater, albeit swifter journey times.
- For older people, there is more to being 'sustainable' than being within 15 minutes' drive of a town.
- It is wishful thinking to argue that younger people will vacate houses in more sustainable locations in favour of new build 3 or 4 bedroom houses on sites within 15 minutes of a town so that the ageing population can move in.
- New housing should be placed close to employment sites. A distance of 15 minutes' drive or 30 minutes public transport (when available) to larger towns should be very much a maximum with the longer-term aim reduce those times particularly for private transport.
- The mass adoption of electric cars will very largely negate any concern about car journeys causing environmental pollution.
- Working from home drives internet connectivity which reduces commuting.
- Growth will place additional strain on small unsuitable country roads many of which have no street lighting nor pavements.
- A large number of new homes will be built in a few locations, giving rise to a higher concentration of commuters on unsuitable roads.
- New homes should not all be built in large housing estates on the edge of existing towns, as they will lead to increased commuting.
- Increased travel from large developments in West Dorset to employment areas in East Dorset, Hampshire or further afield would achieve the opposite of environmental objectives.
- Schooling and shopping will become more dependent on motor transport to the urban centres whilst the pool of helpers that support the village pension-aged residents, including in-comers retiring there, will decline.
- There is a need to improve public transport, and access to a retained and improved range of local services, whilst protecting the character of rural settlements.
- 30 minute public transport travel time should not be used to guide the location of acceptable development, as this is irrelevant unless there is a high frequency service.

Alderholt

Turley on behalf of Wyatt Homes

- Despite its population size Alderholt has very few existing services, little employment and is not well connected to other higher tier settlements.
- The proposals for larger scale development options at Alderholt are not consistent with the settlement hierarchy.
- Large-scale residential development in the absence of the necessary infrastructure, employment and public transport improvements would represent inappropriate and unsustainable development, at odds with the overall spatial strategy.

Wyatt Homes

- The proposals for Alderholt are not consistent with the settlement hierarchy, as there is no certainty about the delivery of infrastructure due to multiple land ownerships. Without this infrastructure, development would be inappropriate and unsustainable.

Public response

- Recognition that there would need to be an investment in infrastructure to support delivery of new homes at Alderholt is welcomed.

Buckhorn Weston & Kington Magna

Buckhorn Weston & Kington Magna Parish Council

- Concern that villages will become more and more places for the retired - Plan recognises this but does not appear to offer any solutions.
- Important that villages reflect the needs of all age groups to minimise the drift of young people away to the towns.

Charminster

Barton Wilmore on behalf of Wyatt Homes

- Providing homes at Charminster close to Dorchester will help to reduce travel by unsustainable means of transport, as well as supporting the continued role of the County town. Improving the balance between jobs and homes and reducing the level of commuting across Dorset should continue to be a priority for the Local Plan.
- Development at Charminster (under Policy DOR14) would be in accordance with paragraphs 72 and 103 of the NPPF.

Developers/Landowners/Agents

- Allow delivery of small-scale sites at these larger villages such as the opportunity that exists on land to the south-east of Westleaze in Charminster.

Child Okeford

Greenslade Taylor Hunt on behalf of Messrs J C, R I and M J Drake and Mrs S A Dean

- Child Okeford should not only be assigned a growth target based on meeting local needs, but it should also have a much more significant role to play including meeting wider needs. Its development potential should not be arbitrarily limited based on a binary and over-simplified planning policy.

Colehill / Wimborne

Chapman Lily Planning on behalf of Mr and Mrs Alves

- Wimborne / Colehill and the outlying villages are the most logical location to meet any unmet housing need from neighbouring areas.

Colehill Parish Council

- Colehill and Wimborne have their own development needs. The Local Plan must provide separate housing allocations for Colehill and Wimborne Minster.
- The pattern of housing allocations suggests that areas such as Wimborne and Colehill are at risk of being absorbed into BCP in the future.

Compton Valence

Compton Valence Farms

- A number of people want to live in Compton Valence but there is not enough housing, solely as a result of the extensive AONB blanketing many rural areas across Dorset and preventing development.
- There is a need to increase the housing stock in Compton Valence to bring prices down and provide an adequate number of homes for rural workers to live in.

Cranborne

Cranborne Parish Council

- Cranborne could not absorb any extensive new housing.

Chair of Governors, Cranborne Middle School

- If all the developments take place in urban extensions, and the villages are protected for 'wildlife and recreation' their populations will become increasingly aged, and the villages devoid of all services.
- The local estate produced a plan for Cranborne in 2016 which outlined small housing and office developments around the village.
- The 2012 Parish Plan seeks to maintain the existing village services whilst acknowledging that to support Cranborne and retain young families, there must be more housing.
- Support a limited and sensitive extension to housing in and around Cranborne to support important local facilities, whilst ensuring the excellent local schools in particular remain viable.

Developers/Landowners/Agents

- The proposed extension to the village infill envelope at Cranborne, as shown in Map 5.4.3.4. of the East Dorset Local Plan Review document, is supported. This proposed extension to the village infill envelope should be included in the Dorset Local Plan.

Gascoyne Estates

- There has not been any review of the allocations formerly proposed at Cranborne (in the emerging Local Plan for the former East Dorset), where the sites were subject to consultation and had a measure of community support.

Crossways / Moreton Station

Crossways Parish Council

- Crossways is not a sustainable location for the levels of further growth which are being considered. The proposed growth is both disproportionate and unsustainable.

Nexus Planning on behalf of Hallam Land Management

- We support the significant expansion of Crossways / Moreton Station.
- As the plan identifies Crossways / Moreton Station as a location capable of significant expansion, this area should be a focus of the Council's identification of locations for large scale strategic growth.
- As identified by Policies DEV2 and DEV3, Crossways is sustainably located to meet the needs of both the South Eastern and Central Dorset Functional Areas. It is also a sustainable location to accommodate unmet housing needs from the Bournemouth, Christchurch and Poole (BCP) Authority area.
- It is one of few locations that is not subject to any landscape or Green Belt designations.
- It is located adjacent to an existing railway station in the Weymouth – London rail corridor allowing new homes to be occupied by future Dorset residents who can secure high value jobs in London and other major cities.
- Policies CRS5, CRS6 & CRS7 are new allocations with the remaining sites either benefiting from planning permission or are allocated through a former district plan. Only 465 new dwellings are actually proposed to be provided for by the plan at Crossways / Moreton Station.

Pegasus Group on behalf of Persimmon

- The approach to development at Crossways / Moreton Station is confused. The location is identified as being within the Central Dorset Functional Area, but the development strategy indicates that housing at this settlement may contribute towards housing needs in both the Central and South East Functional Areas.
- The Council should set out clearly what proportion of the growth at Crossways will contribute towards development in each of the Functional Areas.

Persimmon Homes

- The plan should set out what proportion of the growth at Crossways / Moreton Station would contribute towards development in each of the Central and Southeast Functional Areas in order to avoid the double counting of housing need.

West Dorset Conservative Association

- Gravel workings at Woodsford near Crossways are a potential location for housing development.

Dorchester

Bellway Homes Limited (Wessex)

- As set out in the draft Plan, Dorchester despite being heavily constrained and having a population half the size of Weymouth, could receive 6.75 times the level of growth.
- The opportunity to address the 'significant imbalance' in the town in terms of jobs and housing is acknowledged, but the draft plan and the evidence base do not instil confidence as to the deliverability of the proposed allocations at Dorchester.

Gillingham

Vortal Homes Ltd

- The proposed housing allocations at Gillingham place an over-reliance on large areas of land with significant housing numbers.
- There are substantial infrastructure and other constraints which need to be considered as these allocations come forward for development.
- As a result, future housing delivery is unlikely to be in line with the draft plan's wider expectations.

Longburton

Public response

- Longburton is an unconstrained site in a village with more than two key service. Such a site should be enabled by policies that recognise its sustainability benefit, not constrained by restrictive policies.

Lytchett Matravers

Dudsbury Homes

- Given the strong functional relationship with BCP and the high housing need in eastern Dorset Lytchett Matravers is rightly considered to be a location that can support additional growth.
- Growth at Lytchett Matravers should be accommodated on appropriate sites that provide good access to the village's services and facilities.

Lytchett Minster

Bloor Homes

- As Upton is built to its physical boundaries and further expansion of Lytchett Matravers is already proposed, Dorset Council should consider the Lytchett Minster and Bere Farm area, as it is relatively constraint free, has available land at scale and is served by Lytchett Minster Secondary School.
- At Lytchett Minster and Bere Farm there is potential for innovative placemaking, including strategic housing provision, functionally linked with Upton and Lytchett Matravers and with a strategic countryside park at its heart, as set out in the 'Lytchett Countryside and Villages Vision' document.
- Land at Lytchett Minster and Bere Farm could help to meet Dorset's development needs (plus any BCP Council unmet need) in a sustainable manner. It a logical next option in this part of South East Dorset and should be included in the Local Plan as a strategic development area.
- It has the potential for a new settlement, which would enable the Council to look ahead for over 30 years. The site should be identified in the Local Plan now to future proof the approach and to plan for its comprehensive phased delivery, both in the short and longer term.
- The strategic potential of the site was overlooked through the SHLAA process and has not been assessed as part of the Council's sustainability appraisal process.
- The area is suitable for strategic growth because: it has direct access to town and countryside; it is relatively constraint free; it is served by public transport; it is close to main roads; it is close to major workplaces at Holton Heath, Upton and Poole; it is served by Lytchett Minster Secondary School; there are existing local community facilities; there is an opportunity to boost growth; development could be contained by the landform and woodland blocks; and there are

opportunities for strategic SANG and green infrastructure provision with attractive walking and cycle links between local settlements and services etc.

- The land is in a single ownership and provides an opportunity to deliver a comprehensive, strategic approach that cannot be achieved at any other location in South East Dorset. It could be phased to meet both short term and longer-term needs.

Martinstown

Greenslade Taylor Hunt on behalf of Morrish Homes / Morrish Homes

- There should be some housing growth in Martinstown, which is assumed to be in Tier 4. Local circumstances and the implications of Covid and Brexit have not been considered.
- Martinstown has a functional relationship with the settlements of Winterbourne Steepleton and Winterbourne Abbas, the latter of which is host to the local school. Housing growth would support the public houses, school, places of worship, bus routes and village hall shared across the cluster of villages. The sustainability merits of development for this cluster should be considered together.

Motcombe

- The landscape at Motcombe is undervalued.
- Existing facilities at Motcombe (such as shop and bus service) are not guaranteed.
- If sustainable locations are considered to be ones within 15 minutes' drive of the larger towns, extreme pressure will be placed on Motcombe.

Portland

Portland Town Council

- Would Portland's status as a Tier 2 settlement attract the right employment?

Portland Port

- The profile of Portland Port in the plan should be raised and the opportunities it offers as the only deep water commercial port in the plan area should be emphasised.

Sixpenny Handley & Pentridge

Sixpenny Handley & Pentridge Parish Council

- Sixpenny Handley is a thriving community for surrounding small villages and hamlets, which must be valued and worth future investment. It needs infill development and expansion to improve infrastructure, including investment in the local bus service and transport links.
- Without proper inclusion in the Dorset Plan, Sixpenny Handley and Pentridge and many of the surrounding locations will slowly lose these amenities and the quality of life for residents in rural locations will severely deteriorate.

Stalbridge

Public response

- There is an inconsistent approach to further housing growth between Stalbridge and Sturminster Newton.

Sturminster Newton

Greenslade Taylor Hunt on behalf of South West Strategic Developments Limited

- Elevate Sturminster Newton to a higher ranking in the settlement hierarchy and allocate further land for housing to reflect available employment land.

Grassroots Planning on behalf of Land Value Alliances

- Sturminster Newton needs growth to sustain its role by increasing usage of facilities and to address the issue of the ageing population in the area.
- Not allocating any new housing or employment land at Sturminster Newton is undermining the aim of creating a sustainable pattern of growth.

Public response

- There is an inconsistent approach to further housing growth between Stalbridge and Sturminster Newton.

Sturminster Marshall

Chapman Lily on behalf of the Brown Family

- There is limited scope to amend the Green Belt around Corfe Mullen and Upton, but releases around Sturminster Marshall would be acceptable.

Swanage

Public response

- Swanage is an unsustainable location with poor infrastructure.
- The lack of any further employment land opportunities in Swanage, demonstrates its unsuitability as a Tier 2 settlement.
- Further housing development should be resisted.

Thornford

Thornhackett Parish Council

- Policies appear to give sufficient safeguard against inappropriate development in Thornford but with some flexibility to allow local services to continue.
- Concerned that unless boundaries are adhered to, sites such that being currently developed on land that was outside the previously Defined Development Boundary will continue to the detriment of the village.

Verwood

West Dorset Conservative Association

- Verwood is a potential location for housing development.

West Moors

Somerston Development Projects Ltd

- As a Tier 2 settlement, West Moors is a sustainable location for growth and although the options for expansion of the settlement are limited, there is clear scope for growth to the north and southeast.

Weymouth

Bellway Homes Limited (Wessex)

- There is a significant imbalance between the amount of growth expected in and on the edge of Dorchester compared with Weymouth.
- Weymouth should be a major focus to deliver a meaningful proportion of the 30,481 homes target identified in draft Policy DEV1.
- Land at Louviers Road and Littlemoor urban extension should be attributed a greater contribution to the supply of housing.

Winfrith

West Dorset Conservative Association

- Winfrith would be a good location for brownfield residential development. It is well-located for road and rail travel and was previously marketed unsuccessfully for commercial use.

Wool

Wool Flora and Fauna

- Not all allocated sites are strategic, particularly Wool.

4. Green Belt review

NPPF, Paragraph 138 - 'to prevent urban sprawl'

Town and Parish Councils

- Respondent disagrees with the need to release Green Belt.

Environmental groups (non-statutory)

- Respondent considers that release of Green Belt is unsustainable.

Developers/Landowners/Agents

- The respondent agrees with the intention and justification to review Green Belt boundaries, and to remove sections where appropriate.
- Respondent supports the proposed changes to the Green Belt. The changes are needed to enable development.

Public response

- Respondent considers that the growth of the south eastern functional area settlements around the conurbation highlight the fact that the Green Belt does not prevent sprawl.
- Respondent does not consider that Green Belt release to support delivery of new homes will solve the housing crisis.
- Respondent considers that land should not be released from the Green Belt (as a finite resource which should be conserved) as a matter of principle, and therefore the council should rule out all options for development in the Green Belt.
- Any changes to Green Belt boundaries should be agreed by local communities.
- The Green Belt no longer serves its original function and should be abandoned.
- The council's approach to Green Belt release is inconsistent with the way it deals with planning applications for development in the Green Belt/the process for considering these applications.

- Respondent agrees that there is a need to amend the Green Belt to enable development.

NPPF, Paragraph 139 - Five purposes

Town and Parish Councils

- Priority has to be given to the five principals of GB policy as outlined in the NPPF and this seems to have been done.

Developers/Landowners/Agents

- Council should seek to safeguard land as part of its Green Belt review.

Public response

- The council should only consider release of Green Belt which does not serve any of its purposes.
- The council should give Green Belt more weight (in reference Green Belt purposes) as a consideration when selecting development options/preparing its development strategies.

NPPF, Paragraph 139 - Exceptional circumstances

Town and Parish Councils

- The council has not presented evidence to substantiate:
 - that there are exceptional circumstances to justify the release of land from the Green Belt, including all four proposed housing allocations at Colehill; and
 - that there is limited supply of brownfield sites or sites suitable for intensification.
- Green Belt policies affect only the South-Eastern Dorset Functional Area so consideration for release of land from GB policy is appropriate.

Developers/Landowners/Agents

- Respondent supports the Council's approach to Green Belt release and agrees that 'exceptional circumstances' are justified.
- Respondent argues that it is clear that the Council has followed national policy on examining all other reasonable alternatives to Green Belt releases and have justified clear and compelling exceptional circumstances.

Public response

- The council has not fully evidenced or justified changes to Green Belt boundaries or demonstrated exceptional circumstances. The respondent does not consider that planning constraints and housing needs do not amount to exceptional circumstances.
- The council has not clearly defined exceptional circumstances.
- Respondent considers that Green Belt release should only occur if justified by exceptional circumstances once all other options have been exhausted.
- Respondent considers that existing housing commitments meet housing needs for this part of Dorset, the delivery of further homes through Green Belt release does not amount to an exceptional circumstance.
- Respondent does not consider that the council should release Green Belt for housing to meet the housing needs of neighbouring areas.

NPPF, Paragraph 140 - Need to amend Green Belt boundaries

Home Builders Federation

- It is agreed that there is a need to amend Green Belt boundaries.

Developers/Landowners/Agents

- Respondent welcomes the recognition in paragraph 2.4.9 and section 2.5 of the need to amend Green Belt boundaries in order to deliver sustainable development.
- Council has fully evidenced and justified proposed changes to Green Belt boundaries.
- The recognition that green belt boundaries need to be amended in order to deliver sustainable development is supported.

Public response

- Respondent agrees with the approach to development, apart from the amendment of Green Belt boundaries.

NPPF, Paragraph 141 - All other reasonable options

Developers/Landowners/Agents

- The evidence base should set out to what extent opportunities outside the Green Belt were considered and the basis for such opportunities being rejected as unsuitable.

Public response

- The council has not fully explored the opportunities to meet development needs outside the Green Belt.
- Respondent considers that the council should focus growth around Alderholt as an alternative to releasing land from the Green Belt.
- Respondent considers that development needs should be satisfied with allocations outside the Green Belt and that landowners/developers have not had sufficient time to promote sites outside the Green Belt.
- Respondent considers that delivering more appropriate forms of development for older people (in right locations: within existing settlements, close to services and facilities) would release housing stock into the market to meet needs for new homes and avoid the need for release of Green Belt for housing development.
- Respondent considers that alternative sites need to be identified for development to avoid the use of Green Belt land.
- In relation to the Green Belt, the Council has not examined fully all other reasonable options for meeting its identified need for development. The respondent argues that the Council should examine fully (in the SA) the option of meeting the South Eastern functional areas needs across the wider Dorset area.
- Not clear that all other options for meeting development needs have been explored before considering Green Belt release.

NPPF, Paragraph 141 a) - Brownfield Sites

Town and Parish Councils

- Respondent considers that brownfield sites must be prioritised over Green Belt to reflect para 136 and 137 of the National Planning Policy Framework.

Community group (non-statutory)

- Respondent considers that further clarification is needed to evidence that housing needs cannot be satisfied through delivery of homes on underutilised land in lieu of Green Belt release and that exceptional circumstances have not therefore been evidenced. As part of this the respondent considers that the council might need to consider compulsory purchase.

Public response

- Respondent considers that brownfield land should be developed in preference to Green Belt land and that the council should publish a list of brownfield sites.
- Respondent considers that more brownfield land is likely to become available within existing settlements following the Covid-19 pandemic and changing patterns of behaviour around shopping and that the council should take this into consideration when finalising its development strategy for South East Dorset.
- Respondent considers that the housing requirement identified in the emerging local plan should be adjusted (reduced) to take account of Green Belt as a constraint, the opportunities to deliver homes on brownfield or underutilised land and be based on a local assessment (the local assessment should take Brexit into consideration).
- Respondent argues against building large developments in the Green Belt and would prefer to see brownfield land developed instead.
- Respondent considers that there are available and suitable brownfield sites in Wimborne Minster which should be developed as a priority and in preference to development on land released from the Green Belt.
- Vacant retail and town centre buildings should be looked at, especially for affordable [to buy or rent] properties.
- Accurate evidence base is needed - lack of evidence of consideration of brownfield sites.

NPPF, Paragraph 141 b) - Optimises density

Developers/Landowners/Agents

- The council must ensure appropriate densities are achieved on development sites released from the Green Belt to make optimal use of land (the council can impose minimum densities on sites to prevent poor use of land and urban sprawl).

NPPF, Paragraph 141 c) - Neighbouring authorities

Developers/Landowners/Agents

- There is a need for an uplift in housing requirements to accommodate unmet need from adjoining areas, notably the BCP Council area and the New Forest authorities.
- The need to fulfil the 'duty to co-operate' should affect the scale of provision required to be made by Dorset Council in the South East Dorset area in particular.

Public response

- Respondent considers that Bournemouth, Christchurch and Poole Council should seek to meet their own needs for development on brownfield land within their administrative area.
- The council should not plan to meet unmet housing need from Bournemouth, Christchurch and Poole Council area.
- The unmet need [in BCP] for employment land is not yet quantified or substantiated.
- The need for cooperation with BCP overspill is not sufficiently addressed.
- Approach to meeting the need from neighbouring areas is not evidenced or justified.

NPPF, Paragraph 142 - Sustainable patterns of development

Developers/Landowners/Agents

- Respondent supports the council's review of the Green Belt given its responsibilities to plan positively to meet housing needs and supports delivery of homes in sustainable locations.

- Respondent supports the council's proposals for Green Belt release around the conurbation, main towns and selected villages in south eastern Dorset.
- Respondent supports the amendment of Green Belt boundaries, which is considered necessary to ensure a sustainable pattern of development in the South East Dorset area in view of the significant demand for housing and development.
- Importance of the spatial strategy ensuring growth continues in support of strategic priorities and meeting need from BCP - directed to suitable and sustainable locations.
- Need to avoid disproportionate growth at smaller settlements - unsustainable travel patterns, impact on character of villages.

Public response

- The council should take account of changes to working practices (which mean there is no longer the need to closely locate homes next to/within existing settlements) when considering the distribution on homes in its housing strategy for those settlements within/inset from the Green Belt.
- Respondent considers that the arc of settlement allocations in or close to the conurbation Green Belt highlights the illogicality of the green belt and that the restrictions on development in the Green Belt have encouraged unsustainable patterns of growth (with development focused around the edges of the Green Belt).
- Respondent supports the changes to Green Belt boundaries which provide the opportunity for sustainable development (retaining small areas of Green Belt serves no logical function).
- Respondent considers that land around Green Belt settlements is a sustainable location for growth and new homes.
- Respondent argues that the Green Belt is preventing development in the correct places and instead is forcing development into green fields beyond the Green Belt boundary. This is pushing development to unsustainable locations.

NPPF, Paragraph 142 - Compensatory improvements

Natural England

- The council has not presented any evidence in respect to compensatory improvements to remaining Green Belt in respect to environmental quality and accessibility. For this reason, Natural England does not agree that the council should reference this as an exceptional circumstance, and that in some instances the argument for Green Belt release is unsound.

Environmental groups (non-statutory)

- Council has not demonstrated compensation could be delivered for harm to biodiversity connected with Green Belt release and development with new homes.
- Respondent would only support Green Belt release in conjunction with compensatory environmental improvements.

Town and Parish Councils

- The respondent feels that the Green Belt could be amended, but it should not be reduced. Any loss must be compensated by new Green Belt designations to maintain the total area.
- The respondent considers that the loss of the Green Belt will not help the environment. therefore, measures should be applied to ensure that it is as environmentally friendly as possible and to reduce its environmental impacts.

- Respondent considers that if Green Belt is to be used for development, it must have minimal adverse environmental impact.

Public response

- Habitat site mitigation projects (including Suitable Alternative Natural Greenspace) should not be treated as a compensatory measure that justifies release of Green Belt.
- Respondent considers that release of Green Belt should be compensated through extensions to Green Belt boundaries elsewhere.

NPPF, Paragraph 143 - Defining green belt boundaries

Public response

- The emerging local plan should precisely define any new Green Belt boundaries to avoid any challenges when planning applications are considered.

NPPF, Paragraph 144 - Open character of the village

Public response

- Respondent considers that Green Belt is defined to prevent urban sprawl and maintain openness, the council's proposals for Green Belt release to support delivery of homes are contrary to this objective and would harm the Green Belt's character.

NPPF, Paragraph 145 - Enhance their beneficial use (Opportunities for outdoor sport and recreation, retain and enhance, landscape, visual amenity, and biodiversity, improved damaged and derelict land).

Natural England

- The council's Green Belt review should take account of its role/function in providing multi-functional greenspace near urban areas.
- Within the Green Belt the Council should consider measures to actively manage/promote development which: delivers publicly accessible green space, enhances biodiversity, enhances/creates links between habitats, reduces pollution from nutrients and delivers carbon sequestration.

Town and Parish Councils

- Respondent considers that the loss of Green Belt would be counterproductive in terms of wellbeing, attracting tourists, providing benefits to the local communities and the environment.
- Respondent disagrees with the release of Green Belt land, if it results in lots of unconnected green areas. It is argued that Green Belt land needs to be joined-up and does not work if it is fragmented. Many Green Belt sites are now important environmentally and ecologically.
- Habitat connectivity and the delivery of ecological networks are also considered essential. Less fragmentation means the land works better as a natural habitat and is able to deliver a much wider range of ecosystem services.

Public response

- Respondent considers that Green Belt release for development is likely to lead to net losses in biodiversity.
- Green Belt provides essential ecosystems and a 'green lung' for the people in South East Dorset and BCP - need to preserve it.

- Respondent considers that release of Green Belt land for new development will damage Dorset's natural beauty.
- Respondent considers that Green Belt has a broader function around preserving peoples' wellbeing (including their mental and physical health), recreation (including the keeping of horse), preserving trees/hedgerows, managing/mitigating the risks from flooding (proposed development threatens the flood plain of the River Stour), tourism, acting as a 'green lung', and maintaining biodiversity. Council should only consider Green Belt release where its broader function/role would not be compromised.
- Respondent considers that proposals for Green Belt release should be accompanied with measures for ecological enhancements.
- Respondent considers that proposed Green Belt release, and housing allocations, will have an adverse impact on tourism.
- Respondent considers that amendments to the Green Belt would only be acceptable if balanced by improvements in 'green corridors' for wildlife across the non-Green-Belt areas of Dorset and also if it leads to preservation / expansion of existing green and wildlife areas within conurbations, in order to make the towns more 'liveable'.

4.1. Green Belt - Other issues

Green Belt review

Cranborne Chase AONB

- Section refers to the green belt review but does not set out how that process will be undertaken.
- Suggestion that also adding additional land into the green belt to sustain its purpose and function would be more reassuring.

Developers/Landowners/Agents

- Respondent considers that more detailed evidence needs to be gathered to show the proposed Green Belt boundaries where release is proposed.
- Should take a settlement-by-settlement approach to determine the most appropriate site for new housing rather than a blanket approach to discounting housing sites within existing settlements.

Public response

- The council's Green Belt review does not consider wider planning considerations arising from development on the land which it proposes to release.
- The Council's rationale for amending the Green Belt is broadly agreed.

Generalised harm rating

Developers/Landowners/Agents

- Respondent considers that the 'generalised harm ratings' for the large parcels defined in the council's evidence, could mean that the council misses' opportunities for sustainable development in smaller more discrete areas within these parcels.

Public response

- The council should not consider Green Belt release where its evidence indicates that there would be a 'high' level of harm to Green Belt function, and it should only release Green Belt for development where land has been assessed as having 'low harm'.

- Respondent considers that council's Green Belt assessment is not robust (specifically the parcel sizes for land around Wimborne are too large).
- The harm arising from Green Belt release must be assessed and mitigated taking account of sustainability, amenity, public health and environmental considerations. If harm cannot be mitigated the council should not consider releasing Green Belt.

Cumulative impacts

Community group (non-statutory)

- The council has not presented evidence on the cumulative impacts of Green Belt release.

Environmental groups (non-statutory)

- Respondent considers that the evidence prepared by the council does not consider the cumulative impacts of Green Belt release.

Erica Trust

- Concern that the disjointed incremental approach of ongoing nibbling or biting into the greenbelt around the urban fringe is highly likely to impact substantially on surviving grassland habitats. Plan appears not to consider multi-impact on Green Belt in the same overall locality.
- Concern with apparent justification for loss of Green Belt with provision of biodiversity net gain – suggestion that this won't be the case.

Public response

- The council should consider a larger strategic Green Belt release (that would support delivery of a new town in a sustainable location) as opposed to smaller scale piecemeal releases that are being considered in the emerging local plan (the council should avoid smaller scale repeated incremental losses to the Green Belt with each new local plan).
- Respondent considers that ongoing changes to Green Belt boundaries with each new local plan are likely to have adverse impacts on the functioning of the Green Belt. The council should put in place long term limits on Green Belt release.

Further green belt release

Developers/Landowners/Agents

- Council should consider further Green Belt release to support delivery of small and medium sized sites for new homes.

Public response

- Respondent considers that changes to Green Belt boundaries, to release land for development, will act as a precedent for further changes and releases.
- Respondent considers that the council has not considered safeguarding Green Belt land for future release.

Development strategy

Developers/Landowners/Agents

- There should not be strict adherence to defined functional areas and to the settlement hierarchy, as this could lead to opportunities for sustainable development being missed.
- There is no justification for the strategy.
- Lack of logic in terms of the way in which sites have been selected.

Public response

- Respondent considers that it is not clear how the council has taken the Green Belt into consideration when preparing its development strategy.
- Respondent considers that the level of housing growth being considered in Dorset amounts to an overdevelopment of the area.
- Respondent considers that defining Corfe Mullen and Upton as part of the large built-up area 'sets up' the case for Green Belt release around the edges of these settlements.
- Suggest allocating more development within these two top tiers of development without the need to remove the development boundary and releasing land from the Green Belt to meet housing numbers.
- Housing can be easily met by better allocation and higher density of development of Tier 1 and Tier 2 settlements.
- Land allocated for homes in the Green Belt should be allocated for amenity/biodiversity/climate change mitigation.

Housing need

Town and Parish Councils

- Respondent considers that the need to conserve the Green Belt (and protect SSSIs) is a good enough reason to reduce the housing numbers being requested by government.

Public response

- The assessed need, using government's methodology, is overstated and the council has not challenged findings of this assessment.
- Respondent considers that the housing land supply identified in the emerging local plan (with capacity for 39,285 new homes) exceeds the locally identified need (30,481 new homes), and that the need for housing land does not amount to an exceptional circumstance.
- If the estimate of housing need for Dorset has been overestimated, release of Green Belt should be unnecessary.

Small and medium sized sites

Public response

- The council has not provided any mechanism for delivering small and medium sized sites in those parts of the Green Belt which do not serve any purpose. Identifying, or providing a policy which supported delivery of homes on these types of site, would make the council's housing land supply more resilient.

Environmental Impact

Public response

- Respondent considers that local plan policies should require environmental impact studies to be undertaken as part of any Green Belt release.

Climate change and ecological emergency

Environmental groups (non-statutory)

- The council should consider how Green Belt can promote nature recovery/adaptation and mitigation to climate change.

- The council should prioritise conservation of ecologically diverse sites and sites which have an important function within the green infrastructure network.

Public response

- Respondent considers that release of Green Belt is inconsistent with the council's declaration of a climate change emergency.
- Council to consider how it can promote nature recovery and climate action in the Green Belt.
- Development in the Green Belt will contribute to climate change.
- Respondent considers that the aim of reducing the carbon footprint of new development should be factored into proposals.

Infrastructure, services, and facilities

Public response

- Respondent considers that Green Belt release, leading to additional residential development, would create overcrowding and overwhelm existing services and facilities (including local roads, schools, and medical services).
- Respondent considers that housing growth should be focused close to existing facilities where it will help villages to become more sustainable.
- Respondent considers that the release of Green Belt to support development is likely to:
 - Increase traffic pollution with associated public health issues.
 - Create a local demand for jobs in area which lacks employment opportunities.
 - Increase the risks from flooding.
 - Place further demands on existing infrastructure.

Design quality

Public response

- Green Belt should not be released unless other planning issues arising from the development can also be resolved (including the policies around achieving a high-quality design whilst also addressing environmental considerations) and impacts on local road network should be considered against impacts on the Green Belt.
- Respondent notes that Building Better, Building Beautiful does not comport with Green Belt development
- Housing allocations delivered on land released from the Green Belt are not likely to be appropriate for older people (aged over 75 years) because of their edge of settlement location.

Employment

Public response

- Respondent considers that the justification for release of Green Belt for employment purposes is linked to the delivery of housing.

Agriculture and farming

Community group (non-statutory)

- Respondent considers that proposed Green Belt release could reduce rates of agricultural production.

4.2. Green Belt release at Settlements

Bere Regis and Lytchett Matravers

Public response

- The council's analysis around the sustainability of Bere Regis (outside the Green Belt) and Lytchett Matravers (inset but surrounded by Green Belt) are inconsistent with one another.

Corfe Mullen, Wimborne Minster and Colehill

Community group (non-statutory)

- Respondent considers that proposed Green Belt release around Corfe Mullen, Wimborne Minster and Colehill could affect the Green Belt's integrity.

Environmental groups (non-statutory)

- Respondent does not consider that Green Belt should be released at Corfe Mullen or Wimborne Minster & Colehill because of adverse impacts: on biodiversity and wider ecological networks.

Corfe Mullen, Lytchett Matravers, Upton and Sturminster Marshall

Public response

- Respondent considers that release of Green Belt to support delivery of housing development around Corfe Mullen, Lytchett Matravers, Upton and Sturminster Marshall is likely to lead to unsustainable patterns of travel and is inconsistent with the requirement to consider promoting sustainable patterns of development when reviewing Green Belt boundaries.

Corfe Mullen

Developers/Landowners/Agents

- Respondent considers that Corfe Mullen is a suitable location for changes to Green Belt boundaries to support delivery of new homes.

Public response

- Respondent considers that Green belt release, to support delivery of homes, around Corfe Mullen will have an adverse impact on local character.

Beacon Hill (near Corfe Mullen)

Beacon Hill Brick Company Ltd & Glandel Ltd

- Respondent considers that further changes to Green Belt boundaries should be made to release the land around Henbury Waste Plant (totalling 17 ha). Release from the Green Belt would support investment in facilities without harm to its setting.

Ferndown & West Parley

Environmental groups (non-statutory)

- Respondent considers that the proposed Green Belt release and development around Ferndown and West Parley would isolate: Ferndown Common, Poor Common, Parley Common and Merritown Heath, in a manner inconsistent with the plan's environmental policies.

Public response

- Respondent considers that Dudsbury Golf Course is a local facility and key open space which should not be developed.
- Respondent considers that Green Belt function in the area between Ferndown and West Parley and the northern edge of the Bournemouth, Christchurch, and Poole Conurbation, would be undermined (merging of towns and urban sprawl) by release of Green Belt around Ferndown and West Parley.

Lytchett Matravers & Lytchett Minster

Developers/Landowners/Agents

- Respondent considers that there are exceptional circumstances for changes to Green Belt boundaries around Lytchett Minster and Bere Farm for several reasons including:
 - Green Belt release would be consistent with the findings from the council's Green Belt review.
 - would encourage sustainable growth.
 - Green Belt release would allow enhancements to the countryside (both through to environmental quality and accessibility).
 - Long term boundaries could be formed alongside Green Belt release at these locations.
- Suggestion that parcel LY22 of the Green Belt Assessment has a similar contribution score as proposed allocations in Lytchett Matravers, and only moderate overall impact of harm from Green Belt release – support the site for release ahead of other sites.

Public response

- Respondent considers that Lytchett Matravers is not a sustainable location for further significant amounts of housing because of a lack of services/facilities, employers, and poor public transport.
- Respondent considers that Lytchett Matravers is not a sustainable location for growth and the proposed release of land to the south and south east of the village is inconsistent with aims of defining Green Belt around the village in 1980 (the council should consider release to the north and west of Lytchett Matravers).
- Respondent considers that some of the assessments underpinning the harm ratings for parcels around Lytchett Matravers do not appear to be logical (in particular the ratings for parcels LY7 and LY18 do not appear to take account of these parcel's role preventing merging of the large built-up area with Lytchett Matravers).
- The council should review its development strategy for new homes and consider Green Belt release at Lytchett Minster where development would also support delivery of a sizeable Suitable Alternative Natural Greenspace (the greenspace would act as a compensation for any Green Belt release).

Sturminster Marshall

Developers/Landowners/Agents

- Respondent considers that Sturminster Marshall is a sustainable location for further housing and the proposed changes to Green Belt boundaries at Station Road will provide a logical extension to the existing settlement.
- Respondent does not support the overall parcel assessment findings presented in the council's Green Belt review in respect to parcel SM10.

Sturminster Marshall & Lytchett Matravers

Developers/Landowners/Agents

- Respondent does not consider that Green Belt release around Sturminster Marshall and Lytchett Matravers has been properly evidenced or justified, as there are other opportunities to deliver homes at Tier 2 towns and Tier 3 villages outside the Green Belt.

St Leonards & St Ives

Developers/Landowners/Agents

- Respondent considers that council should investigate the opportunity for release of further Green Belt of previously developed land which does not contribute to openness (as part of this process the council should specifically investigate the opportunities for release at Matchams Stadium).

Upton

Developers/Landowners/Agents

- Council should consider further Green Belt release around Upton including:
 - Land to the east of Watery Lane (which would support delivery of new homes in a sustainable location [adjacent to a Tier 1 settlement], provide high quality open space and local connectivity [between Frenches Green, Policemans Lane and Upton SANG]).
 - Land at Frenches Farm Upton (which would support delivery of employment and care uses in a sustainable location and provide high quality open space).
- Respondent does not support the parcel assessment findings presented in the council's Green Belt review in respect to parcel UP2 (Upton), but does support the parcel assessment findings for UP1 (Upton) and raises a query as to why this parcel was not subject to an allocation as a development site.

Verwood

Developers/Landowners/Agents

- In terms of the Green Belt review, the respondent argues that the Council should not concentrate all the existing South East Dorset conurbation requirement at Corfe Mullen, but rather they should release Green Belt land to allow for the growth of satellite settlements within existing villages and service centres such as Verwood.

Wareham

Wareham Town Council

- There are no exceptional circumstances for changes to Green Belt around Wareham.

Wareham Neighbourhood Plan Steering Group

- There are no exceptional circumstances to justify a change to the Green Belt at Wareham.

West Moors

Public response

- Respondent recommends that the Green Belt around West Moors should be enlarged to reinstate Blackfield Farm (released from the Green Belt as part of the Christchurch and East

Dorset Local Plan Part 1 – Core Strategy 2014) because of its role in the Green Belt and its ecological diversity (the site is biodiverse and home to UK BAP species).

Wimborne Minster & Colehill

Developers/Landowners/Agents

- Respondent considers that there is greater scope for changes to Green Belt boundaries around Wimborne than Colehill.
- Respondent does not support the parcel assessment findings presented in the council's Green Belt review in respect to parcel CO24 around Colehill.

Public response

- Respondent considers that the proposed Green Belt release, and re-development with homes, around Wimborne will have a harmful impact on town's character.
- Respondent considers that Green Belt function around Wimborne Minster and Colehill will be seriously eroded (merging of towns and safeguarding the countryside from encroachment) with planned release and opposes Green Belt release around Wimborne Minster and Colehill.
- Respondent considers that release of Green Belt land between Wimborne Minster and Colehill (WMC7 and WMC8) would be inconsistent with Green Belt purposes and that this part of the Green Belt is also biodiverse and contains mature trees.
- Respondent does not consider that some of the harm ratings for parcels around Colehill are consistent (specifically the assessments relating to parcel CM8).
- Respondent considers that defining land as Green Belt also supports the preservation of the Cobbs Road Conservation Area. The conservation area is not referenced in the council's Green Belt assessment and the respondent does not support Green Belt release for development in this area (local highways connections and harm to the character of the surrounding area, means that development would not be suitable here).

5. Policy DEV2: Growth in the south eastern Dorset functional area

5.1. Approach

Development Strategy and Green Belt

Please note that more general comments regarding the approach to Green Belt release are summarised under 'Green Belt Review'.

Town and Parish Councils

- Query whether there will be implications for sustainable development in the west from the proposed allocations in southeast Dorset.

Developers/Landowners/Agents

- It is appropriate that there is a specific focus in the Local Plan on the SE Dorset area, as it is the largest centre of population and economic activity in Dorset and an emerging 'City Region', with a more significant demand for housing and development than anywhere else.

- The distribution of development in SE Dorset is overly weighted towards less sustainable, 'outlying' settlements. A greater focus should be at strategic locations near the SE Dorset urban area.
- Amendment of green belt boundaries is necessary to ensure a sustainable pattern of development in SE Dorset, especially in locations closest to the urban area that offer access workplaces and higher order services, leisure and cultural provision.
- Sustainable development opportunities elsewhere within the functional area should have been maximised, so as to minimise any Green Belt release.
- Would recommend that the Council seek to identify either opportunities for the intensification of the quantum of development on sites within the South-Eastern Dorset area, or the allocation of further strategic sites to meet the assessed needs for growth.
- The relationship between of settlements needs to be considered and the opportunities for reducing travel.

Businesses

- The strategy of focusing development at larger settlements and limiting growth at villages to within settlement boundaries or through neighbourhood plans is too restrictive.
- Approach is contrary to the NPPF which calls for opportunities for villages to grow and thrive to be identified; and aim to support a prosperous rural economy.

Public response

- Concern with the failure to address the proximity of BCP and instead of building dormitories for the commuters to employment within that conurbation.
- Suggestion that it is more appropriate to develop the perceived poorer areas of West and North Dorset - encouraging businesses to set up in these areas knowing that they will have access to a mobile working population.
- The northern part of Purbeck, including Lytchett Matravers, is being asked to take an unfair burden of the housing numbers considered to be necessary.
- Need for more focus of meeting local needs at villages.
- Choosing to lower the housing target in SE Dorset would reduce the level of 5 year land supply required and enable DC to resist more easily unwelcome applications to build on Green Belt land.

Heritage

Historic England

- Unclear why some sites in SE Dorset are allocated in the light of the Strategic Landscape and Heritage Studies; why the findings and guidelines in studies have not been positively responded to; and why opportunities to address heritage at risk have not been taken.
- Further work is required on some sites, which may include heritage impact assessments, masterplanning and/or site-specific mitigation and enhancement measures.
- There is no historic environment evidence to support the inclusion of a few sites in SE Dorset and/or to identify the need for site-specific mitigation and enhancement. We cannot come to a view on whether the significance of heritage assets will be safeguarded in such cases and judgement is deferred until further evidence is available.

Public response

- The proposed Purbeck housing allocations will harm local character.

- General concern with the impact on the character of settlements.

Environmental issues and biodiversity

Local environmental groups (non-statutory)

- Disagreement with the combined impacts of allocations on ecological networks, including grassland, which are important habitats within the Green Belt.
- Attempts to retain fragments of the existing significant interest in SANGs whilst destroying the rest can only be a negative impact.

Wool Flora and Fauna

- Disagree with approach to growth in SE Dorset area.

Developers/Landowners/Agents

- Achieving an appropriate balance between delivering much-needed growth without prejudicing the special environmental features of this part of Dorset will be a challenge.
- Any sites that require heathland mitigation (including costed and deliverable SANG solutions) but which cannot provide it, should not be taken forward in the Plan.
- Importance of delivering SANG to mitigate heathland impact.

Public response

- Concern with impact on wildlife resulting from development in SE Dorset.
- Concern with impacts on heathland - would be impossible not to create extra stress.
- Within sensitive and protected areas (including the AONB), developers should not be allowed to mitigate any loss of habitat by paying compensation, as this very rarely results in equivalent habitat being replaced.

Infrastructure

Town and Parish Councils

- More thought to infrastructure is required - amenities need to grow to incorporate the additional population.
- Greater partnership working with the NHS, Clinical Commissioner Group is required to ensure services are not overloaded.

Public response

- Concerns that the approach fails to consider infrastructure - SE Dorset is saturated in terms of population, and there is concern that increase in population will not be followed by increases in schools, drains, doctors, hospital beds, and roads.

Transport and access

Town and Parish Councils

- Roads are often overlooked.

Developers/Landowners/Agents

- The strategy for South East Dorset should reflect the needs of the strategic road network and provide for an RSA.

Go South Coast Buses

- Support for the approach – with some reservations, in those larger allocations on the edge of existing settlements more sustainable than continual village expansion.

Community Group (non-statutory)

- Concern that the approach encourages private transport (in the absence of decent public transport).

Public response

- Only a massive investment in infrastructure (i.e. to the A31) will allow increases in housing.
- Lack of plans to provide improvements to roads and other infrastructure.

Pollution

Town and Parish Councils

- The increase in traffic creates an increase in air pollution.
- Growth in employment sites/needs results in increased traffic/pollution.

5.2. Policy

Policy Approach

Town and Parish Councils

- Agreement with the approach.
- Agree with Criteria I, III, IV, V, VIII, IX and XI.

Cranborne Chase AONB Team

- The strategic policy is rather too precise in identifying specific locations which would be more appropriately identified in detailed policies in Volume 2 – objections to current wording.

Developers/Landowners/Agents

- Support for the suggested approach - broadly consistent with the overall development strategy.
- Approach needs further consideration to ensure that it sits within the settlement hierarchy.
- Suggestion of making the policies and preamble for the policies more encouraging of development and its benefits, when in the right places and locations.

Public response

- Some support for the approach to growth in South Eastern Dorset, but consider that there needs to be reference to potential impacts/constraints arising from windfall development.
- Disagreement with the approach – lack of evidence, not clear how the functional division is made.

Criterion I - IV - Land covered by the south east Dorset Green Belt

Developers/Landowners/Agents

- The plan contradicts itself saying housing is allocated at Wareham.
- Supportive of draft Policy DEV2(III) in so far as the Council intend to release land from the Green Belt at Wimborne / Colehill for development.

- Policy DEV2(III) - there is greater scope to amend green belt boundaries in this area and not all reasonable alternative options for growth have been considered.
- Supportive of draft Policy DEV2 (IV) inasmuch that it sets out the Council's intention to release land from the Green Belt at Sturminster Marshall for development.

Local environmental groups (non-statutory)

- Disagree with the allocation at Corfe Mullen as this comprises Waterloo Valley a site of high biodiversity value and development at Wimborne / Colehill as this comprises Leigh Basin, also of high biodiversity value. Concern with the release of land on the edge of Ferndown and Verwood.

Town and Parish Councils

- Criterion II - does not support large scale development and the release of Green Belt for housing on the edge of towns and other main settlements, unless the local communities welcome it and it achieves full benefits.

Public response

- Policy DEV2(IV) should be deleted from the Plan.

Criterion V - VII - Land beyond the south east Green Belt

Developers/Landowners/Agents

- Criterion V is too narrow, only allowing for windfall and infilling within existing settlements defined by local plan or neighbourhood boundaries.
- Supports criterion VI of Policy DEV2's identification that development at Crossways / Moreton Station will contribute towards meeting the housing requirements of the South Eastern Dorset Functional Area.
- Support policy DEV2, and in particular the logic of supporting larger-scale allocation of land for development at Blandford as outlined at point VI.
- Specific to point VII this allocation is welcomed and would appear to be a sensible way of ensuring that growth is provided across the county as opposed to being delivered just within larger urban areas - benefits of this approach are expanded such as the provision for housing and services.

Criterion VIII - XI - Employment growth across the south eastern functional area

Town and Parish Councils

- Growth in employment sites/needs has an impact on the local community.
- Plan needs a pathway for the rural economy with new workspaces being built in many towns and capitalising on opportunities for jobs in the green economy.

Public response

- Considers that policies should support employers/businesses in rural areas with an emphasis on the 'Green Economy'.

Additional criteria

Developers/Landowners/Agents

- Additional criterion should be inserted into Policy DEV2 to allow for small-scale sites to come forward at Tier 3 villages which are beyond the Green Belt.

- Concern that outside the Green Belt, DEV2 limits development at Tier 3 settlements to windfall and infill – not positive planning.
- Approach misses opportunities for additional small-scale development options at Tier 3 villages which are sustainable locations.
- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).
- Concern that Alderholt doesn't feature within the policy wording of DEV2 - the wording excludes any development at Alderholt save for windfall and infilling within settlement boundaries.
- Policy DEV2 is silent on the circumstances when development of sites located in the open countryside, beyond the settlement boundaries, could be considered acceptable for example in the scenario that Paragraph 11 is engaged, either through a lack of five-year housing supply or out-of-date relevant policies.

National Trust

- Approach needs to explicitly align with national green belt policy - (NPPF para 145) which indicates that "limited infilling in villages" is exempt from being inappropriate development, and infill housing is therefore permissible in principle.

5.3. Comments in respect of specific settlements

Alderholt

Developers/Landowners/Agents

- The approach to deliver a strategic level of development at Alderholt is supported, having regard to the need to demonstrate that all other opportunities for development have been considered before considering Green Belt release.
- There is a clear justification for the delivery of a significant development at Alderholt as the only larger village settlement not subject to significant environmental or landscape constraint within the South-East Dorset functional area.
- Some concern with the 'option' for larger scale development at Alderholt - The level of work and coordination between multiple landowners and the joint working required with New Forest District means that it is inevitably a very long term development option – stretching beyond the term of the emerging DCLP.
- Concern with the impact of development in terms of unsustainable travel patterns, and impact on the character of the village.

Bere Regis

Developers/Landowners/Agents

- Consider that the policy should be amended to include smaller scale allocation of land at Bere Regis.

Blandford

Blandford & District Civic Society

- Can't argue with the concept that Blandford may look more towards the south east (and possibly west) than the rest of North Dorset which looks to Wiltshire and South Somerset.

- Query whether the decision to place it in that functional area is more to do with the revised proposals from the Boundary Commission.
- Blandford's inclusion in the south east rather than north suggests that it is viewed as a dormitory town for Poole and Bournemouth, and whilst further employment development might help to avoid it, the new housing is being provided for those working in the south east.

Developers/Landowners/Agents

- Support for the commitment to growth opportunities at Blandford as a main town/ settlement.

Public response

- Disputes Blandford categorised with SE Dorset group as integral part of Northern Dorset group.
- Insufficient evidence that the plan will see the expansion of employment opportunities in Blandford area for the increased population proposed - will increase commuting.

Cranborne

Developers/Landowners/Agents

- Whilst Green Belt release is necessary to meet needs in SE Dorset, the 'exceptional circumstances' test can only be satisfied if all other reasonable alternatives, such as Cranborne, have been examined.
- The sites at Cranborne represent an opportunity as they were previously identified as proposed allocations in the 2018 East Dorset Local Plan Review Options consultation and confirmed as viable and suitable for development subject to policy change in SHLAA.

Public response

- A small number of houses in Cranborne could help to augment the provision of affordable housing to prevent young people being forced to leave the village.
- The roads which serve the small villages in the Cranborne area are unsuited to an increase in traffic.

Corfe Mullen

Erica Trust

- Paragraph 2.6.5 – suggestion that there is no scope for changing the Green Belt at Corfe Mullen due to unacceptable impacts on biodiversity and ecological networks.
- Approach is inconsistent with previous plans in terms of the crucial function of the Green Belt.
- Strongly disagree with the allocation of land on the edge of Corfe Mullen as this comprises the Waterloo Valley which is an important ecological network of sites of known and potentially high biodiversity value.

Developers/Landowners/Agents

- The recognition that there is limited scope to amend the green belt around Corfe Mullen is supported.
- Support for Corfe Mullen as a sustainable location for growth in the SE Dorset Functional Area.
- When finalising distribution of growth between areas - important to acknowledge pressures on Corfe Mullen from within and outside Dorset (BCP), as well as the function the town plays.

Ferndown

Wareham St Martin Parish Council

- Do not support the release of Green Belt for employment land to the southwest of Ferndown.

Erica Trust

- Less scope for changing the Green Belt than expected.

Public response

- Concern with overdevelopment of Ferndown.

Holton Heath

Developers/Landowners/Agents

- The relationship between of settlements needs to be considered and the opportunities for reducing travel. Holton Heath Business Park needs to be considered in this context and should be included in DEV2 as an opportunity for further employment growth through the allocation of additional land (outside of green belt).

Lytchett Matravers

Public response

- Lytchett Matravers is being asked to take an unfair burden of the housing numbers.

Lytchett Minster and Bere Farm

Developers/Landowners/Agents

- At Lytchett Minster and Bere Farm there is potential for innovative placemaking, including strategic housing provision, functionally linked with Upton and Lytchett Matravers and with a strategic countryside park at its heart.
- This strategic development proposal would enable the Council to look ahead for over 30 years. The site should be identified in the Local Plan now to future proof the approach and to plan for its comprehensive phased delivery, both in the short and longer term.

Public response

- Suggestion that there is ample land for development, for example on the northern boundary of Lytchett Minster, which is only about a ¼ mile from the edge of the conurbation m for hundreds of houses – rejected at previous examination due to it being Green Belt.

Pimperne

Developers/Landowners/Agents

- The approach misses opportunities for additional small-scale development options at Tier 3 villages which are sustainable locations, such as Pimperne.
- Pimperne has the potential to accommodate growth which would support the village's vitality.

Sixpenny Handley

Developers/Landowners/Agents

- Consider that the policy should be amended to include small scale expansion in Sixpenny Handley.

Sturminster Marshall

Developers/Landowners/Agents

- Sturminster Marshall presents one of the most appropriate locations for sustainable development on the periphery of BCP.

Public response

- Concern with the level of housing proposed at Sturminster Marshall.
- Land adjacent to Sturminster Marshall affects significantly the setting of settlements within the Green Belt and should be resisted.
- Sturminster Marshall should fall outside categorisation as a tier 3 settlement as it is a distinct rural village location rather than edge of urban settlement locations.
- The lack of local facilities, relatively poor connectivity of Sturminster Marshall and lack of access to services and employment mean that the land should remain both in the Green Belt and outside any development boundary.
- More development is proposed at Sturminster Marshall than other similar but larger settlements in Dorset.
- Green belt release at Sturminster Marshall is considered more than small-scale.
- Concern with the impact on the character of Sturminster Marshall.

Upton

Lytchett Minster and Upton Town Council

- Concerned by evidence of a failure to locate Upton town as an integral part of the county going forward – little of significance in the plan for Upton, which remains on the edge.
- Concern with the classification of Upton as a large Towns/built-up area, and its distinction from other settlements.
- Concern with the description of Upton - geographically accurate, but incomplete.

Developers/Landowners/Agents

- The recognition that there is limited scope to amend the green belt around Upton is supported.
- Although they are small sites, both Land east of Watery Lane and Frenches Farm provide valuable opportunities to deliver new homes, accommodation for the elderly and employment floorspace at a sustainable location on the edge of a Tier 1 settlement.

Swanage

Public response

- No need for market homes in Swanage.
- Insufficient infrastructure (health care and schools) in Swanage to support further growth.
- Poor connections to and from Swanage.
- No further employment land opportunities in Swanage. Demonstrates unsuitability as Tier 2 settlement. Unsustainable location with poor infrastructure.

Tarrant Gunville

Town and Parish Councils

- Tarrant Gunville is in North Dorset not Southeast Dorset and this should be corrected.

Verwood

Erica Trust

- Less scope for changing the Green Belt than expected.

Public response

- Concern with overdevelopment of Verwood.
- Suggestion that land at Verwood - spent gravel works could take 1500 homes, brownfield site.

Wareham

Developers/Landowners/Agents

- The local plan's strategy, and housing supply, relies too heavily on Wareham Neighbourhood Plan sites that are largely undeliverable and windfall.
- The Planning Inspectors Post Hearing Note prepared in respect to the Purbeck Local Plan (2018-2034) states there are 'no very special circumstances for release of green belt at Wareham' however the preparation of the Dorset Council Local Plan should be treated as a different context and this issue should therefore be re-considered.
- Respondent considers that it is illogical not to allocate further land for new homes at/around Wareham when it is within the definition of sustainable that is set out in the strategy of the plan.
- Paragraph 2.4.7 suggests Wareham as having options for growth but this is at odds with no allocations there.

Public response

- There are inconsistencies between the release of green belt at Wareham throughout the plan.

West Moors

Developers/Landowners/Agents

- Support reference to growth at West Moors in DEV2 - a sustainable growth location where need for market and affordable homes.

Wimborne and Colehill

Erica Trust

- Paragraph 2.6.5 – suggestion that there is no scope for changing the Green Belt at Wimborne/Colehill due to unacceptable impacts on biodiversity and ecological networks.
- Approach is inconsistent with previous plans in terms of the crucial function of the Green Belt.
- Strongly disagree with the allocation of land at Wimborne/Colehill as this comprises the Leigh Basin which is an important ecological network of sites of known and potentially high biodiversity value.

Developers/Landowners/Agents

- Wimborne Minster is a sustainable settlement on the outskirts of the conurbation that is much better placed than other 'outlying' villages to deliver the growth required over the plan period.
- Wimborne Minster is a functional part of the conurbation and therefore is well placed to help accommodate any unmet need from the BCP conurbation.

Public response

- Concern with overdevelopment of Wimborne.

Wool

Public response

- Suggestion that land at Winfrith proposed innovation park should be partly allocated for housing - sustainable location, lack of main employment area coming forward, around 1200 homes.

Figure 2.2 and 2.6

Erica Trust

- Suggested amendments to remove Corfe Mullen allocations, reduce Wimborne/Colehill allocation from 495 to no more than 190, potentially reduce Ferndown allocation from 1,100 to no more than 700, and potentially remove Verwood allocation.

Public response

- Figure 2.2 extends too far north into areas which are not influenced by the conurbation.

6. Policy DEV3: Growth in the Central Dorset Functional Area

6.1. Approach

Development Strategy

Town and Parish Councils

- Strategy lacks any clarity between housing and job growth.
- Although the main issue referenced for the Central area is the imbalance between Weymouth and Dorchester, it is difficult to see how the proposals will fundamentally alter this.
- A solution would be more jobs proposed in Weymouth and none in Dorchester.
- There is nothing to the West of Dorchester, thereby increasing car journeys to work and back. Tiers should only be used as a guide and not the master plan.
- No clarity on issues and needs of each area that correlates to proposed amount of development in each and extent to which all of the settlements within each zone could contribute to this need.
- It needs to be considered whether smaller developments away from current urban centres where infrastructure could be enhanced to the benefit of new and existing residents would be a better option that focussing growth to the north of Dorchester.
- The policy includes reference to housing growth through windfall and infilling within existing settlements defined by local plan or neighbourhood plan development boundaries (part (v)), but:
 - does not specifically reference that the local plan boundaries can be amended;
 - does not specifically reference that growth could also be identified through neighbourhood plan site allocations (which may not necessarily be within a defined boundary);
 - does not reference that growth could be delivered through other Localism Act tools such as neighbourhood development orders;
 - does it appear to allow for employment growth to be identified through neighbourhood plan allocations or policies.

- It may be helpful if the policy were to be rephrased to more clearly articulate the role of Neighbourhood Plans, and distinguish between strategic growth areas (the larger scale allocations) and more local growth that may contribute to the overall strategic needs.
- As it stands, there is a concern that the policies could be interpreted as prohibiting housing or employment growth identified through Neighbourhood Plans.
- It is also not clear why Puddletown is referenced for smaller-scale expansion and other villages with neighbourhood plans proposing some small scale growth are not. Nor does it appear to allow for employment growth to be identified through neighbourhood plan allocations or policies. Respondent suggests that the policy is rephrased to more clearly articulate the role of Neighbourhood Plans, and distinguish between strategic growth areas (the larger scale allocations) and more local growth that may contribute to the overall strategic needs.

Developers/Landowners/Agents

- Plan must consider making allocations at all Tier 3 settlements in order to adequately meet housing need in the rural area.
- Approach restricting development in Tier 3 villages to windfall/infill is not positive planning.
- Approach misses the important opportunities for additional modest-scale development options at Tier 3 villages which are sustainable locations.
- New strategies should be adopted to manage sustainable growth - all smaller settlements taking a percentile of their housing as growth - equality.
- Effectively only seven named locations in the Central Dorset functional area where development can be delivered with any certainty.
- Concern with the under supply of housing land, and is likely to be further undersupplied with housing land due to the prescriptive aims of the emerging plan.
- In light of under supply of housing that the new local plan should seek to offer as many sensibly planned development opportunities as possible.
- Suggestion that disbanding settlement boundaries allows merits of development to be properly considered whether adjacent to or within the built up area.
- Strict adherence to defined functional areas and the settlement hierarchy could lead to opportunities for sustainable development being missed.

Public response

- Disconnect of development boundaries from real community and environmental sustainability. Needs to be firmly justified if this citing of boundaries is to underpin all rural development.
- Little scope for infilling and intensification within existing employment sites.
- Council should focus on brownfield development/renovation of existing buildings rather than development on green fields.
- The local plan should allocate land for affordable homes on brownfield land.
- The spatial strategy should emphasise priority is development on Brownfield sites.
- The absurdly high allocations to Dorchester, Crossways and Moreton all need to be reduced dramatically by a half or more.
- Prioritisation of Dorchester over Weymouth and Portland should be flipped on its head for employment.
- Suggestion that housing development at Weymouth and Portland would reduce residents' quality of life - will require the inhabitants to out-commute if they are to afford a mortgage.

Environment

Developers/Landowners/Agents

- Maximise development in areas that are less constrained - outside of AONB, flood zones etc.

Infrastructure

Town and Parish Councils

- Lack of infrastructure to support proposed level of growth.

Developers/Landowners/Agents

- Reference to paragraph 182 of the NPPF - introduces the 'agent of change principle' - requires that policies should ensure that new development can be integrated effectively with existing businesses and community facilities.
- Need to take into account that it is common for clusters of settlements to share facilities and experience a degree of interdependence.

Neighbourhood Plans

Developers/Landowners/Agents

- Concern with ability of NPs to allocate land outside of a settlement boundary - many villages unable to prepare and have Neighbourhood Plans 'made'.
- Often the Plans are diluted simply to get a majority at referendum.

Minerals

Developers/Landowners/Agents

- Minerals should be referred to as a constraint within these policies outside of DDBs - they are protected through national and local planning policies.
- Safeguarding minerals is essential to ensure they are not unnecessarily sterilised or constrained.
- Plan needs to fully consider whether it would result in any restrictive rights on the minerals work, transport or processing in conjunction with the adopted minerals and waste plan.

6.2. Policy

Policy approach

Hall and Woodhouse

- Policy approach is not sound and contrary to the objectives of the NPPF to secure sustainable development.
- Focussing developments at larger settlements and limiting growth to within boundaries or through neighbourhood plans is too restrictive - goes against paragraphs 78 and 83 of the NPPF, which: call for opportunities for villages to grow and thrive to be identified; and aim to support a prosperous rural economy.
- There should be policy encouragement to enable growth to take place within and immediately adjacent to settlement boundaries (subject to meeting other development management criteria) - to enable villages to stay viable and meet local needs.

Developers/Landowners/Agents

- The suggested approach and what it is trying to achieve, is supported.
- The suggested wording is supported.
- Approach and wording is not supported.
- Objection to the current wording of draft Policy DEV3 inasmuch that it omits allocate any development at Broadmayne.
- Plan must consider making allocations at all Tier 3 settlements in order to adequately meet housing need in the rural area.
- Policy focuses only on two larger villages out of 13.
- The policy wording should be broader to include more of the tier 3 settlements which will offer more flexibility and a greater chance of meeting the housing need over the plan period.
- Approach needs further consideration to ensure that it sits within the settlement hierarchy.
- Suggestion of making the policies and preamble for the policies more encouraging of development and its benefits, when in the right places and locations.

Public response

- Disagree – lack of evidence, not clear how the functional division is made.

Criterion II.

Public response

- Criterion II - Agree that there should town centre regeneration.

Criterion IV.

Developers/Landowners/Agents

- Support the acknowledgement at Criterion IV of Policy DEV3 that housing growth should be delivered through the expansion of the larger villages, including Charminster.

Criterion V.

Developers/Landowners/Agents

- Criterion V is too narrow, only allowing for windfall and infilling within existing settlements defined by local plan or neighbourhood boundaries.

Public response

- Criterion V - There has already been significant infill and densification within Weymouth. Further development of this type will change the character of the town by creating contiguous developments resulting in urban sprawl rather than maintaining the distinct separated settlements within Weymouth.

Criterion VI.

Developers/Landowners/Agents

- Supports criterion VI of Policy DEV3's identification that development at Crossways / Moreton Station will contribute towards meeting the housing requirements of the Central Dorset Functional Area.

Additional criteria

Developers/Landowners/Agents

- Additional criterion (VI) should be inserted into Policy DEV3 to allow for small scale greenfield extensions at Tier 3 Larger Villages to come forward.
- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).
- Suggestion of making the policies and preamble for the policies more encouraging of development and its benefits, when in the right places and locations.

6.3. Comments in respect of specific settlements

Dorchester

Local groups and partnerships

- Major reservations about the major development proposed for land north of Dorchester - development will destroy an area rich in wildlife and rights of way, and with extensive literary and historic associations which draw visitors from around the world.
- The plan should be seeking to protect this landscape, not destroy it.

Developers/Landowners/Agents

- Suggestion that there are better options than expansion north of Dorchester - increase in vehicle traffic, increased flooding on River Frome - contrary to NPPF - climate change concerns and increased flooding. Concern regarding funding for flooding mitigation.
- Need for town centre redevelopment in Dorchester - will have to be sensitive to the likely impact any new development will have on the historic character of the town which draws tourists to the area.
- Provision of homes close to Dorchester to reduce unsustainable travel, and support the role of the county town should continue to be a priority for the local plan - improving balance between jobs and homes.
- Policy DOR13 - it would be reasonable to expect no completions from the allocation for 10 years from the anticipated adoption of the plan in 2023, only c.800 homes could reasonably be expected from this source of supply.
- Concern that predicted build out rates are optimistic for the North of Dorchester site.

Public response

- Dorchester will double in size within 40 years - queries justification, need to increase affordable housing and decrease commuting from cheaper areas to jobs.
- Significant growth at Dorchester will not help to make Dorset more sustainable.
- Development to the north of Dorchester is likely to increase unsustainable travel.
- Development to the north of Dorchester is likely to increase the risks from flooding.
- Suggestion to remove the North of Dorchester proposal.
- Proposed housing around Dorchester will have adverse effects on the character of the town.
- Does not agree that the proposed housing around Dorchester is needed.
- Suggestion to add the need for town centre regeneration to Dorchester.

- Suggestion that it is illogical to consider Dorchester as anything more than a small administrative centre, due to its relationship with surrounding functional areas, which generally function separately.
- Suggestion that at least 40% or more of the jobs in Dorchester are very vulnerable to being automated and hence Dorchester will not need all the workers the plan thinks it needs.

Weymouth

Developers/Landowners/Agents

- Supportive of the statement that Weymouth is a 'major coastal resort', but objects to the assertion that housing growth will be delivered through town centre regeneration and two allocations totalling 550 homes.
- Weymouth's tabled contribution towards housing growth falls woefully short of its top-tier status in the settlement hierarchy.

Public response

- In the central area there is additional scope for housing development around Weymouth (with its good rail links) in excess of the proposed volumes.
- Littlemoor offers little scope for traditional employment and is too remote for tourism employment.
- No new homes needed on land to the west of Southill.
- The housing requirement for Weymouth Town Council Area should be reduced to take of planning permission and existing allocations.
- Development in Weymouth should be focused on brownfield land and previously identified allocations.
- Permitted and planned growth for the Weymouth area exceed local needs.
- Further infilling in Weymouth should be restricted.
- Greenfield allocations around Weymouth are having an adverse impact.
- Suggestion of development at Bincombe as hillside village.

Crossways

Town and Parish Councils

- Crossway's Parish Council does not oppose growth in Crossways provided it is sustainable for the community (as opposed merely meeting the wider areas need for homes).
- Crossways Parish Council considers that future growth for the village should be limited to 700 new homes.
- Need for the Central Dorset functional area will not be met by Crossways in a sustainable way.

Developers/Landowners/Agents

- Crossways / Moreton Station's well-located to meet the housing needs of the Central Functional Area. Given that it has an existing train station; it is one of the most sustainable settlements in the Functional Area. It is also unconstrained by landscape designations.

Public response

- Crossways is not a sustainable location for significant growth because of its poor transport links, position relative Dorset's larger towns, limited employment opportunities and development viability.
- The Crossways policy does not offer employment opportunity.

Portland

Public response

- Disagreement with inclusion of Hardy Complex in Portland within housing supply - it is undeliverable.
- Development Boundaries on Portland should be redefined to include sites under construction, where planning permissions have been granted and the small area between committed sites.

Growth at villages

Developers/Landowners/Agents

- Puddletown has the potential to accommodate growth which would support the village's vitality.
- Compton Valence meets six factors for growth and satisfies the spatial strategy.
- Development at Broadmayne would offer the opportunity to absorb some of the development pressure on Dorchester.
- The lack of growth at Broadmayne is conspicuous in its absence, especially given that it falls within the same position in the settlement hierarchy and is physically closer than Crossways/Moreton to Dorchester.
- Sites in villages can be delivered at a faster rate than larger allocated sites - important contribution to the Council's five-year housing land supply.
- Growth in smaller villages - maintain and enhance economic vitality and the services and facilities required would be maintained - para 78 of NPPF.
- Many villages outside of those named in DEV3 have the ability to accommodate housing growth for their betterment and that of the district, but have limited opportunities within their settlement boundaries.
- Need to be cognisant that that development at lower-tiered settlements can support growth at settlements in different tiers, particularly where upper-tier settlements are constrained.
- Promoting growth in rural settlements can support the sustainability of rural communities.

Public response

- Frampton would welcome small development which is sensitive to the needs of local people.
- Milton Abbas is a small village and has permanent population less than 500 – sums have erroneously included people from the Milton Abbey School and double counted – school contributes nothing to Milton Abbas, no facilities or school etc and survives on tourism – development would ruin this.
- Opportunity to look at the different needs of rural communities – are in desperate need of new homes on a small scale.

7. Policy DEV4: Growth in the Northern Dorset functional area

7.1. Approach

Development Strategy

Thornhackett Parish Council

- Housing growth appears to be adequately provided in this policy however policies regarding employment growth need further consideration.
- Concern with increasing car use when intensifying employment around existing employment sites - particularly in those villages where there is no or little public transport.

Cranborne Chase AONB

- Figure 2.2 – shows area around Sixpenny Handley in Northern Functional area – when other parts of the plan say it is SE Dorset Functional Area.
- It would be helpful to have greater detail and clarity on the extent of the areas.

South Somerset District Council

- Inconsistency between housing numbers in provided in Figure 28.3 and the key diagram (Figure 28.4).

Developers/Landowners/Agents

- Only five named locations (towns) in the Northern Dorset functional area where development can be delivered with any certainty.
- The area already has an undersupply of housing land, and is likely to be further undersupplied with housing land due to the prescriptive aims of the emerging plan.
- Would like to see settlement boundaries scrapped and replaced by a criteria-based policy that would allow the merits of development that is adjacent or within the built-up area to be properly considered.
- Need for sufficient flexibility to enable the Plan to meet housing need across the functional area of North Dorset, and Dorset as a whole.
- Previous reliance on a few strategic allocations has created backlogs with delivery of homes.
- There should be a balance of sites of different scales and market offer to support delivery throughout the Plan.
- Concern there is no Local Plan delivery trajectory or a reassessment of existing allocations - threatens the soundness of the Dorset Local Plan – these are required to evaluate the deliverability assumptions made.
- Regarding the 5-year housing land supply – a broader range of development sites are required to ensure deliverability - emphasised by NPPF paragraph 68.
- Should be more smaller sites as they can deliver at a faster rate than larger sites. They also help to maintain the vitality of rural areas and the retention of services and facilities.
- Significant functional area which already has an undersupply of housing land, and is likely to be further undersupplied with housing land due to the prescriptive aims of the emerging plan.
- Respondent considers that the development strategy/approach for Stalbridge and Sturminster Newton are inconsistent with one another.

- Respondent considers that further housing allocations at Sturminster Newton will give resilience to the supply, and that in generality further housing allocations are required in the North Dorset functional area to create a resilient supply and meet needs for affordable homes (taking account of historic undersupply and current position in respect to five year supply).

Public response

- Respondent suggests that a new town on North Dorset should include an Economic Zone with Business rate and Corporation tax relief and you will attract employment.

Functional relationship with surrounding areas

Developers/Landowners/Agents

- Plan fails to deliver growth that supports the clear and evidenced functional relationship between Dorset and South Somerset.
- The strategy should be amended to support development at Yeovil to encourage more sustainable patterns of commuting and address climate change.
- Need for further housing allocations in the North Dorset functional area to create a resilient supply and meet needs for affordable homes (taking account of historic undersupply and current position in respect to five-year supply).
- Council should review the housing requirement for the northern part of Dorset Council area taking account of: the implications of the Covid-19 pandemic and the low cost housing offered in neighbouring areas including Yeovil and Milborne Port.

Growth at villages

Developers/Landowners/Agents

- Many villages have the ability to accommodate housing growth but have limited opportunities within their settlement boundaries.
- There should be more growth in the smaller settlements (particularly Tier 3 villages), as would help to maintain the vitality of rural areas and take account of paragraph 78 of the framework, which promotes housing growth in rural area.
- Reconsider the opportunities for growth in villages - including Bishops Caundle, Yetminster, Thornford and Longburton.
- Many villages are able to accommodate housing growth, but either have no development boundary or have limited opportunities within their settlement boundaries.
- Concern that villages such as Longburton would have their settlement boundaries removed and their development prospects limited.
- Sustainability credentials of these villages to support a commensurate level of housing growth is being missed and villages are not being given the opportunity to evolve - policy should be amended to allow villages with some key services to grow in a sustainable manner.

Public response

- Blandford should be part of the Northern functional area as it is an integral part of it.
- Building on existing settlements is parasitic on existing communities and infrastructure is already strained - instead we should be planning for a new town.
- The plan seems resigned to the area being a dormitory for other parts of Dorset.
- Need to reduce workers commuting long distances by road.
- More diffuse development across Dorset would mean less pressure to release Green Belt.
- Concern regarding local incomes and housing affordability.

- North Dorset area is not an easy area to plan for as is at the cusp of four housing market areas.

Infrastructure

Thornhackett Parish Council

- Consideration needs also to be given to locations where employment growth in more remote areas will enable greater investment in infrastructure and particularly in telecomms infrastructure.

Public response

- Development is likely to increase commuter traffic.
- Development likely to urbanise the community.
- Development at the expense of local communities' quality of life.
- Infrastructure (services and facilities in the town centre/schools) needed to support the committed and proposed levels of growth.
- Concerns around the impacts of planned growth on Mere.
- Further car parking required at the railway station (Gillingham?).
- Impacts on water supply.
- Development must support infrastructure (e.g. schools, hospitals, etc) with a plan to attract skilled people to keep these facilities running (e.g. affordable housing).
- Too much development and infrastructure issues.
- Concern over infrastructure capacity in the northern area is insufficient to meet planned growth.
- A link to addressing transport issues would make the economic growth aspect more plausible.

7.2. Policy

Policy approach

Developers/Landowners/Agents

- Policy DEV4 should be amended to include small scale expansion in Sixpenny Handley and the smaller scale allocation of land at Bere Regis.
- Marnhull is comparable in size with other larger villages that have proposed housing allocations – Charminster and Sturminster Marshall are smaller than Marnhull, and Stalbridge is only marginally larger.
- Policy DEV4 does not present any growth opportunities along the A303 to support this logical location for growth.
- Growth should also be located within the more rural areas to assist in maintaining the vitality of these areas.
- Policy DEV4 is silent on the circumstances when development of sites located in the open countryside, beyond the settlement boundaries, could be acceptable. The policy and the plan do not reflect National Planning Policy in this regard.

Public response

- Policy DEV4 should take a settlement-by-settlement approach to determine the most appropriate sites for new housing rather than a blanket approach to discounting housing sites within existing settlements.
- Support for bulk of development at Tiers 1 and 2.

- Policy does not specifically reference the local plan settlement boundaries.
- Broad support, but the spatial strategy should clearly set out the development needs that the functional area must address.
- Disagree – lack of evidence, not clear how the functional division is made.

Criteria I.

Developers/Landowners/Agents

- General support for the approach - including recognition of the role that towns such as Gillingham will continue to play as part of the growth strategy.
- Support the suggested distribution of new homes in the northern functional area, in particular around Sherborne.
- The council should consider a single allocation for West Sherborne that combines SHER4-6 to support comprehensive re-development and master-planning.
- Support the distinction between Gillingham and the smaller towns but suggest this could be reflected in the settlement hierarchy.

Criteria II.

Developers/Landowners/Agents

- The wording of bullet point 2 “more modest expansion” is ambiguous and is likely to be subject to misinterpretation and inconsistency in decision making – needs clarifying in the interest of soundness.
- Stalbridge - not persuaded that there is available evidence to support planned levels of growth at Stalbridge, and questions whether this is a sound approach to take having considered all reasonable alternatives.
- Lack of housing development allocated at Sturminster Newton is confusing and inconsistent with the spatial strategy and the wording of policy DEV4 as drafted.

7.3. Comments in respect of specific settlements

Sherborne

Sherborne Castle Estate

- The council should review proposed housing allocations around Sherborne taking account of its function/demands & unmet need arising from neighbouring areas.
- It would not be sustainable (having regard to encouraging sustainable travel and the effects of large scale allocations on historic character/interest) to re-direct growth to the small villages on the northern functional area.
- Reference to a masterplan developed for development at Sherborne - A comprehensive re-development of the site would confer wider benefits.

Public response

- In reference to the proposed housing allocations around Sherborne, housing needs in this area satisfied by growth at Yeovil and Gillingham.
- Should be additional housing development around Sherborne / Yeovil borders to take account of employment opportunities / good transport links with A303 / A30.
- Sherborne is being turned into a commuter town for Yeovil.

Shaftesbury

Cranborne Chase AONB Team

- Concern with the expansion of Shaftesbury and the impact on the AONB.

Persimmon Homes

- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).
- Support for a settlement hierarchy and categorisation of Shaftesbury as a tier 2 settlement.
- The growth strategy is unsatisfactory and deficient – there should be more growth at Shaftesbury.
- Would like a more flexible mixed-use allocation on land south of A30, Shaftesbury, that could deliver an element of non-B use class employment (such as school and retail or care home use) and a small element of starter units.

Grassroots

- Policy DEV4 (Northern Functional Area) – suggest the term '*more modest expansion*' in the second bullet point should be clarified. In reference to employment, the policy should consider the potential for employment growth outside defined sites through revised wording which supports/allows employment land on suitable sites.

Public response

- There is scope for further development around Shaftesbury (on the western side).
- Support for "modest expansion of Shaftesbury" - while there are constraints, opportunity for enhancing existing sites should be considered.

Gillingham

Walsingham Planning on behalf of Vistry Group Ltd and Hallam Land Management Ltd

- Policy should allocate a further urban extension at Gillingham.

Vortal Homes Ltd

- Uncertainty around Gillingham Southern Extension delivery - will not meet housing targets in medium term.

Cranborne Chase AONB Team

- Gillingham with a mainline rail station is a strategic location and could be a gateway to AONB – however concern over expansion of town and visual impact on AONB.

Network Rail

- Growth at Gillingham is stated as at the southern extension. Given that the railway is on the south side of Gillingham, this may assist a modal shift to rail.

Gillingham Town Council

- Policy needs to clarify that there is only one urban extension proposed at Gillingham.
- Concern that growth of Gillingham is not proportionate.
- Concern over loss of green spaces.

Stalbridge

Stalbridge Town Council

- Stalbridge is not comparable to other Tier 2 towns having regard to the size of its population and the services/facilities that it offers.
- Growth in Stalbridge should be limited to reflect the size of the town and its limited services/facilities (limited capacity in schools, no GP, limited range/number of shops and limited public transport services).
- Proposed levels of growth at Stalbridge are not sustainable.
- Growth should be spread across the council area to reflect settlement size.

Public response

- Stalbridge's need for homes addressed with current development (120 homes north of Lower Road and 60 homes off Thornhill Road).
- Planned growth at Stalbridge unsustainable (rural setting/historic core) and disproportionate relative to its size/supporting infrastructure.
- Planned growth will change Stalbridge's character.
- Stalbridge does not have the infrastructure (GP surgery, NHS dentist, local employers or sufficient capacity in primary school) to support development.
- Planned growth in Stalbridge will encourage trips made using cars because of a lack of services and facilities (no bank or GP surgery).

8. Policy DEV5: Growth in the Western Dorset Functional Area

8.1. Approach

Development Strategy

Town and Parish Councils

- Suggested that the growth and changes in work and living styles will result in a rethinking of employment space together with house sizes and numbers to allow more homeworking.
- Concern with how development boundaries are viewed and interpreted by officers – to justify decisions to grant planning permission on the basis that a development is “just outside” or “adjoining” the DDB.
- Need to review the proposed development strategy to take account of the impacts of the Covid-19 pandemic and Brexit.
- It is appropriate for Charmouth to be categorised as a Tier 3 settlement.
- Need for new businesses – premises and hubs for smaller enterprises.
- Need for an up to date rural-based local economy.
- Need for rural social housing.
- Neglects the rural populations and smaller villages.
- Lacks recognition of the part farming/farmland plays in the environmental/natural capital of West Dorset.
- Strategy does not address the ‘social isolation and loneliness’ of rural areas.

- Respondent considers that the effects of Brexit and Covid-19 pandemic could have a direct effects on how the western functional area creates sustainable development within its sensitive rural and AONB environment.
- Respondent suggests that the growth and changes in work and living styles will result in a rethinking of employment space together with house sizes and numbers to allow more homeworking.
- Respondent suggests that further consideration needs to be given to this shift in work life approach, not forgetting the now essentials of broadband connectivity and improvement in local/long distance physical transport links.

Local groups and partnerships

- Changes in the dynamic of the workforce due to COVID-19 may call for a reappraisal of home sizes, numbers etc. to provide for homeworking.
- Need to consider impacts of Brexit and COVID-19 before submitting the plan for examination.

Developers/Landowners/Agents

- We are broadly supportive of the approach in the local plan, but we are concerned regarding the distribution of development across the settlements in the Western Dorset area.
- Needs to be much greater emphasis on, and an explicit reference and support for, rural employment opportunities – particularly for the western Dorset functional area being the more rural.
- A focus on 'urban' commercial sites risks inadequate support and opportunities being given for rural business to expand and develop – rural employment opportunities need more focus.
- Concern with the impact of the approach on the economy and resilience of the district.
- Concerns are regarding the distribution of future development across the settlements in the Western Dorset area.

Public response

- The spatial strategy does not set targets for new homes/employment land.
- Need to consider exceptional circumstances for assessing a local housing need, based on heritage landscape, natural habitats, wildlife, geological features, historic towns ancient monuments, a range of designations for habitats/species/landscapes, Green Belt, congestion around the conurbation and severe pressures on infrastructure.
- Council should consider small/medium sized sites and a review of the existing settlement boundaries in the context of the housing need.
- Housing provision should be based around local needs and genuinely affordable housing.
- Not clear on how many new jobs might be created in this part of Dorset.
- Council has not presented site assessments/appraisals/other evidence to justify proposed allocations for homes/employment.
- Concern with imposing development on small villages.
- Put windfall first.

Environment

Town and Parish Councils

- Effects of Brexit and Covid could have a direct effect on how the Western Functional Area creates sustainable development within its sensitive rural and AONB environment.

Local groups and partnerships

- Objection to the inclusion of land at Beaminster as this is incompatible with ENV4 and the protection of designated landscapes.
- The benefits of additional housing land will not outweigh the harm to the unique landscape setting of Beaminster.
- Should be planning for land for nature recovery at the same time as housing and jobs with an holistic approach to planning.

Developers/Landowners/Agents

- Need for more balance with the economic activities and needs of rural areas having equal importance with landscape and environmental qualities.

Public response

- The whole of area lies within AONB - protection of green environment is a prime concern.
- Reference to Housing Secretary statement on local communities setting own rules for development in their area - reflect and enhance surroundings, preserve local heritage.

Transport

Town and Parish Councils

- Lack of reference to the A35 west of Dorchester and traffic related issues at Chideock and Winterbourne Abbas.
- No mention of discrete relief roads for Chideock and Winterbourne Abbas.
- No mention of any major new highway to replace the A35, which is ancient and unsuitable.
- Addressing issues of the A35 would have potential local and tourism benefits.
- It will be difficult to attract larger businesses to Beaminster due to poor transport links.

Network Rail

- In Western Dorset there are plans for expansion at Bridport, Lyme Regis and Beaminster. None of these locations are currently rail served but there may be scope for improved bus links to and from railheads.

Public response

- A35 carries too much freight - incompatible with the route and contributes to pollution.

Infrastructure

Town and Parish Councils

- Lack of infrastructure to support the proposed level of growth.
- Lack of infrastructure provided previously.
- Shifts in the work-life approach – essentials of broadband connectivity and improvement in local/long distance physical transport links in the area.
- Whilst Beaminster acts as a hub for surrounding parishes, those services are slowly depleting.

Public response

- Needs to be more provision for improvement to local services - schools, doctors, roads etc.

Neighbourhood Plans

Town and Parish Councils

- Policy needs to be re-phrased to more clearly articulate the role of Neighbourhood Plans, and recognise that local communities may also define development boundaries within Tier 4 settlements.

Second homes

Town and Parish Councils

- Need to limit second home developments in coastal towns and villages.

8.2. Policy

Policy approach

Town and Parish Councils

- Broadly supports the principle of a hierarchical, tiered approach.
- Supports the approach whereby the vast majority of development is located in areas with existing community facilities, infrastructure and transport links.
- Policy is well balanced but the wording should explicitly reflect the status of the AONB and its implications.
- The characteristics of Western Dorset justify defining it as a separate housing and economic market area from Central Dorset.
- Does not reflect the characteristics and needs of the West Dorset local area: is a plan for urban areas, whilst West Dorset is largely rural.
- Does not address critical conflicts between tourism and environmental integrity specific to West Dorset – the business advantages v the environmental damage.

Hall and Woodhouse

- Policy approach is not sound and contrary to the objectives of the NPPF to secure sustainable development.
- Focussing developments at larger settlements and limiting growth to within boundaries or through neighbourhood plans is too restrictive - goes against paragraphs 78 and 83 of the NPPF, which: call for opportunities for villages to grow and thrive to be identified; and aim to support a prosperous rural economy.
- There should be policy encouragement to enable growth to take place within and immediately adjacent to settlement boundaries (subject to meeting other development management criteria) - to enable villages to stay viable and meet local needs.

Developers/Landowners/Agents

- Disagreement with the approach - policy should be amended to include small scale expansion in Burton Bradstock.

Public response

- Support for the finding that the rural area has limited scope for growth.
- Disagree – lack of evidence, not clear how the functional division is made.

Criterion II.

Public response

- Concern with identifying proposed development at Beaminster as ‘small-scale expansion’. The 400 units overall (since 2015) represents a 25% increase in the number of dwellings.

Additional criteria

Developers/Landowners/Agents

- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).

8.3. Comments in respect of specific settlements

Bridport

Public response

- Scope for limited expansion of Beaminster and Lyme Regis, query why this doesn't apply to Bridport.
- Accepted that housing has to be provided to meet all needs and it makes sense to combine the bulk of this in the major development at Vearse Farm where community facilities can be included.
- Many of the ingredients for sustainable places can be found in Bridport; human scale, walkability, independent retail and a wealth of social capital.

Beaminster

Public response

- Concern with the reliance on large housing allocations in Beaminster.
- Concern with the proposed proportion of development at Beaminster - suggestion to reduce.

9. Policy DEV6: Development at villages with development boundaries in rural Dorset

9.1. Development at villages in the south east dorset green belt

Paragraph 2.6.15

National Trust

- Approach needs to explicitly align with national green belt policy - (NPPF para 145) which indicates that “limited infilling in villages” is exempt from being inappropriate development, and infill housing is therefore permissible in principle.

Developers/Landowners/Agents

- DEV6 Amendment to the settlement boundary should be carried forward for Holt as identified in the 2018 East Dorset Local Plan Review.

- Property, known as Horseshoes, should be included within the proposed settlement boundary extension. This would allow limited infilling to aid the delivery of the additional housing.

Public response

- Support the concept of windfall development to create local homes for local people at villages within the green belt.

9.2. Approach

Paragraph 2.6.16 - Approach

Natural England

- No concerns relating to the proposed policy

Morden Parish Council

- Should take priority over tier 1+2 towns.

Pimperne Parish Council

- Settlement boundaries as shown do not reflect those agreed through Neighbourhood Plan – should use the same boundary to reduce likelihood of further development on far eastern side of A354.

Public response

- Approach considered reasonable.
- Lack of research and evidence.
- Disagreement with expansion in the smaller locations of Dorset.
- Policy of enabling growth pertains to too few villages in the Dorset Council area.
- Doesn't reflect NPPF which doesn't apply strict restrictions to development in open countryside.

Paragraph 2.6.17 - 'take place within local plan development boundaries'

Dorset Climate Action Network

- Welcome the provision for development in villages with development boundaries.

Beaminster Area ECO Group

- Welcome provision for development in villages with development boundaries in rural Dorset.

Developers/Landowners/Agents

- Agree that approach should allow for suitable development within development boundaries and for neighbourhood plan allocations to meet local needs.
- The plan needs to be clearer about how the terms 'local plan development boundary' and 'defined development boundary' are used.

Public response

- Fully support 'take place within local plan development boundaries'.

Paragraph 2.6.17 - 'Local Needs'

Cranborne Chase AONB Team

- Concern with developments proposed to meet local needs being occupied by incomers.

- Strongly advise that greater emphasis is given to local needs in policy DEV6.

Developers/Landowners/Agents

- Policy for 'larger villages' is too prescriptive given that development must be to meet the needs of the local area only. Villages can help meet wider needs of an area.
- Definition of 'local need' is not detailed enough to explain what could support a village and this is a missed opportunity to provide new homes and choice for the wider area.
- Quantum of development should be dependent on the level of provision and constraints.

Public response

- Accept there is a need for homes.

Paragraph 2.6.18 - 'at an appropriate scale to the size of a settlement'

Cranborne Chase AONB Team

- Paragraph 2.6.18 - It would help communities, landowners and developers if the 'appropriate scale' factors could be given dimensions (such as 5% or 10% increase).

Milborne St Andrews Parish Council

- The supporting text; 'at an appropriate scale to the size of a settlement', is supported in principle, but doesn't cover all the issues including; keeping villages' more rural character, maintaining a close connection to the countryside, maintaining a reasonable range of local facilities, having a population size that maintains a village community.

Pimperne Parish Council

- Pimperne proposed to be a tier 3 village - support development at an appropriate scale to the size of the settlement however not clear how tests in para 2.6.18 should be applied - need clarity over what 'appropriate scale to the size of a settlement means'.

Public response

- Self and custom-built houses should be permitted outside settlement boundaries where the site provides high quality design and high-level sustainability/passive energy efficiency.
- Further detail on why the spatial strategy doesn't encompass proportionate development in the smaller villages would be useful.
- Agree that larger villages should not be expected to take large housing developments.

Paragraph 2.6.18 - Community Needs

Public response

- Queries whether 'contribute to supporting community needs' is too vague - does it need specific actionable definitions include education, housing, businesses etc, not terms such as 'character' etc.
- Not just buildings that are needed, but a sense of place – a sense of community.

Paragraph 2.6.18 - Local Infrastructure

Symondsburry Parish Council

- Further consideration needs to be given to this shift in work life approach, not forgetting the now essentials of broadband connectivity and improvement in local/long distance physical transport links.

Paragraph 2.6.18 - 'Cumulative effects'

Public response

- Recognition of 'cumulative effects' of development on 'sense of place' is strongly supported.

Paragraph 2.6.19 - 'local needs'

Milborne St Andrews Parish Council

- Potential to amend development boundaries to meet local needs is specifically referenced in para 2.6.19 and should be reiterated in the policy wording.

Paragraph 2.6.19 - 'change the character and setting of the settlement'

Public response

- Agree with the approach suggested for larger villages (development which meets local need without adverse effects on local character).
- Need to carefully consider retaining village characters.

Paragraphs 2.6.20 and 2.6.21 - Smaller villages

Holwell Parish Council

- Development boundaries have already been introduced at some smaller villages in neighbourhood plans and further 'neighbourhood plan development boundaries' may be identified in the future.

Developers/Landowners/Agents

- Dispersed pattern of growth needed including allocations in large and small villages, which need gradual growth to make them living entities and not stagnant history. Sensitive expansion brings interest, involvement, talent and rewards to rural Parishes.

Public response

- References to development in the smaller villages in paragraphs 2.6.20 and 2.6.21, read together, provide some modest flexibility - but is not translated through to DEV6 and DEV7 - no explicit policy guidance on Tier 4 villages.
- Bourton wished to retain their settlement boundary in consultations on NP and village design statement - wording should emphasise this for all tier 3 villages where appropriate.

9.3. Other issues to consider

Strategy

Developers/Landowners/Agents

- Settlement-by-settlement approach should be undertaken to determine the most appropriate site for new housing rather than a blanket approach to discounting housing sites within existing settlements.
- Should thoroughly review local settlement boundaries of all villages to support local growth in housing.
- If the Local Plan considers it appropriate for local communities to prepare a neighbourhood plan to bring forward land for housing at non-Green Belt settlements, then why does such a process

not form part of this Local Plan, especially in cases where the landowner has worked closely with the community to develop the proposals?

- Tier 3 villages have limited potential for growth within existing boundaries, and lack of certainty over NPs coming forward.
- DEV6 should take the opportunity to allow for appropriate growth at some Tier 3 settlements, such as Pimperne, which would support local needs and the overall spatial strategy. The scope of the policy should be widened to allow for extensions to the Tier 3 villages to come forward outside of the development boundaries where they contribute to meeting local needs and are appropriate in scale to the size of the settlement (as per criteria II and III of the policy).
- Small scale allocations (where they are up to 1 hectare in size) will contribute to the national planning policy requirement contained in paragraph 68 of the NPPF for 10% of the overall requirement to be planned on identified small sites - otherwise there is a lack of certainty of meaningful contribution of Tier 3 villages to local needs and small sites requirement.
- Consider that the final sentence of the policy should be deleted because it is not necessary. Once Neighbourhood Plans are 'made,' they become part of the Development Plan and therefore development proposals will have to accord with these policies, unless material considerations indicate otherwise.

Public response

- Focusing growth around larger towns could lead to unsustainable travel and suggests that it might be more sustainable to spread new homes around smaller villages where they might contribute to vitality and viability of existing villages.
- Proposed housing allocations should be spread more evenly across South-Eastern Dorset around existing villages, rather than concentrated around the edges of the larger towns (which encourages unsustainable travel and puts pressure on existing infrastructure).

Housing delivery of small-scale sites

Developers/Landowners/Agents

- The Plan should include a small sites policy, which could only apply outside the green belt, but which permits new homes on sites adjoining existing settlement boundaries.
- With the number of homes on each small site reflecting the specific context, including the size and character of the town or village.
- Should it be required, an upper limit on the number of homes that will be permitted on any single small site around a key (Tier 1, 2 or 3) settlement could be imposed.
- Smaller sites can be delivered at a faster rate than larger, allocated sites and can contribute to the five-year housing land supply. It also helps to maintain the vitality of rural areas and the retention of services and facilities.
- Development should be enabled by policies that allow sites to be considered on their merits whether inside or adjacent any settlement boundary or built up area.
- Such small allocations (where they are up to 1 hectare in size) will also contribute to the national planning policy requirement contained in paragraph 68 of the NPPF for 10% of the overall requirement to be planned on identified small sites - otherwise there is a lack of certainty of meaningful contribution of Tier 3 villages to local needs and small sites requirement.
- NPPF highlights benefits of small and medium sized sites. Policy of enabling growth pertains to too few villages in the Dorset Council area. A positive methodology should be adopted to the identification of those villages capable of accommodating a commensurate level of growth, including; services available to the village population, the physical ability of the village to

expand, and any other planning sensitivities - reference to policy SS2 of South Somerset Local Plan.

- DEV6 should take the opportunity to plan for the delivery of small-scale site allocations at these larger villages to support local needs and the overall spatial strategy.

Public response

- Suggestion that small scale builds across the county would employ local firms and help keep villages vibrant, thriving and sustainable.
- New homes in outlying villages may be essential to maintain the communities there.

Facilities and Services

Buckhorn Weston & Kington Magna Parish Council

- Need to provide facilities as villages, such as play and sports grounds and community centres such as modern village halls, investment into more than key towns is vital if villages are to survive.

Chair of Governors, Cranborne Middle School

- There is no mention of building on resources already present in larger villages such as Cranborne. Cranborne village already has a shop, a post office, a first school and a middle school, a residential school for pupils with special educational needs, a GP practice, a veterinary practice, a sports club, a community hall, two pubs, a restaurant with rooms and a small boutique hotel.

Developers/Landowners/Agents

- Paragraph 78 of the NPPF seeks for planning policies to identify ‘opportunities for villages to grow and thrive, especially where this will support local services’.

Public response

- The proposal that villages with ‘facilities’ should be liable for additional development makes no sense, especially as Cranborne has unsuitable road and public transport links.
- In a Brexit/Covid world it is possible that life for many may become more local, so some thought should be given to reinforcing existing village services in smaller, tier 4 settlements and encouraging establishment of new services + local businesses in what the Rural Development Commission used to do.
- Support making villages local centre for community facilities however this is not borne out in allocations.

Area of outstanding natural beauty (AONB)

Dorset AONB Team

- Support for policy however range of factors listed in the text in relation to size and scale of development should be sufficient to enable protection of the wider landscape context of developments when assessing development proposals.

Cranborne Chase AONB Team

- No reference to local character or landscape matters, which seem to be significant omissions.

Chair of Governors, Cranborne Middle School

- As the village lies in an AONB we completely agree that it would be undesirable to have any major housing development, but there are opportunities to develop the village in a sensitive manner.

Public response

- Development in rural villages would degrade quality of AONB's in Dorset (inc Cranborne Chase) were the scenic qualities to be ruined by excessive building. Conservation and AONB policies must not be overridden.
- This should be a gradual process within strict controls of Conservation and AONB.

Climate and ecological emergency

Public response

- Development under DEV6 must comply with climate and ecological emergency strategy and economy strategy.

Infilling

Public response

- Avoidance of infilling, which reduces the sense of space around town / village buildings.

Brownfield

Developers/Landowners/Agents

- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).

Affordable Housing

Buckhorn Weston & Kington Magna Parish Council

- Low-cost housing as well as amenity investment must be part of the Plan for villages as well as towns. Return more power to the local communities in determining their housing needs.

Gillingham TC

- Exception sites should be located in the villages to keep the villages alive.

Public response

- Policy should be used to stop continued increase in land values that makes affordability impossible for local and key workers - by mandating that only development of affordable housing in villages shall be permitted.

Employment

Lytchett Matravers Parish Council

- Jobs first, houses second - none of these villages are being provided with any employment opportunities.

Symondsbury Parish Council

- Suggested that the growth and changes in work and living styles will result in a rethinking of employment space together with house sizes and numbers to allow more home-working.

Chair of Governors, Cranborne Middle School

- All these plus the local estate provide a good and varied selection of employment opportunities.

Public response

- Should be including employment allocations alongside housing.
- The need for large scale employment sites is decreasing. Vital that employment is provided within rural communities by smaller units.
- Employment land is vital for the rural economy to be sustainable.

Parking & Road safety

Go South Coast Buses

- Tier 3 village locations must be within 30 mins public transport to towns otherwise not sustainable, policy should be amended to cross-reference policy COM7 and state allocations should be within 30 mins public transport.

Broadmayne Parish Council

- Provisos in policy should also cover implications of developments for parking and road safety as this is what a lot of concerns over planning applications are based on.

Public response

- Expanding existing villages also needs roads, infrastructure increases prior to houses.
- Whilst these villages need some development to provide critical mass the amount will be restricted by the poor connectivity that often exists.
- Any significant road increases would adversely impact elements that make Dorset attractive.

Recreation and Open Space

Public response

- As per DEV2, rights of way access and recreational green space adjacent to rural villages should be protected and the bridleway network improved to mitigate the increased traffic on rural roads.

Sustainable development

Developers/Landowners/Agents

- Agreement with settlement hierarchy - urge some caution over options that may direct unsustainable levels of growth to villages in Tier 3 and 4 - through policies DEV6 and DEV7.

Public response

- Term sustainable development is not used however this is an important consideration if larger villages are not destined to become mere dormitory settlements.

Five-year land supply

Fontwell Magna Parish Council

- Reliance of tier 2 villages on development boundaries defined in neighbourhood plans is problematic if the council does not maintain a 5YHLS as a NP only runs for 2 years once made - but this rule needs to be changed to ensure NP boundaries can continue to hold weight throughout the life of a plan.

Developers/Landowners/Agents

- Policy DEV6 is silent on the circumstances when development of sites in the open countryside could be considered acceptable, for example when Paragraph 11 of the NPPF is engaged. Policy does not reflect National Planning Policy.

9.4. Policy

Second Criterion - Tier 4 settlements

Holwell Parish Council

- The second part of the policy appears to relate more to Tier 4 settlements, and this too could be clarified through amending the wording.

Cranborne Chase AONB Team

- Policy needs clarification as it appears to relate to Tier 3 settlements but then refers to neighbourhood plan development boundaries and, in doing so, would appear to relate to Tier 4 villages.

Public response

- The final part of the policy appears to relate to Tier 4 settlements rather than Tier 3 settlements.

Final criterion - Neighbourhood Plans

Town and Parish Councils

- Policy DEV 6 Development in villages, we welcome the support expressed for Neighbourhood Plans.
- No reference to site allocations through Neighbourhood Plans.
- Neighbourhood plans which are in advanced stage should be considered given complexity and demands on residents who have worked on them for years.
- Agreement with the approach in relation to development within Neighbourhood Plan boundaries – must be properly supervised, implemented and consistently applied by planning officers.
- The policy should also state that local communities may also define DDBs within their NPs to meet local needs of an appropriate size (particularly housing) compatible with the character and scale of the settlement.

Developers/Landowners/Agents

- Consider that the final sentence of the policy should be deleted because it is not necessary. Once Neighbourhood Plans are ‘made,’ they become part of the Development Plan and therefore development proposals will have to accord with these policies, unless material considerations indicate otherwise.

Public response

- The reference to NP policies is particularly welcome.
- Suggested amendment to policy DEV6 - “Within neighbourhood plan development boundaries, including those relating to Tier 4 villages, residential, employment and other development will only be permitted if it accords with the relevant policies in a neighbourhood plan, consistent with Section 2.9 and Policy DEV9”.

Additional cross-reference

Town and Parish Councils

- Policy should refer to figure 2.4 for total clarity.

Public response

- Should refer to figure 2.4.

10. Policy DEV7: Development outside local plan and neighbourhood plan development boundaries in rural Dorset

10.1. Approach

Paragraph 2.6.22 - 'Strictly control'

Cranborne Chase AONB Team

- The intention to strictly control development needs to be a reality within the Areas of Outstanding Natural Beauty – needs to be reinforced in the wording.

Public response

- Agree that strict control is necessary in these areas.
- SUPPORT the strict control of development beyond LP and NP boundaries, but what is allowed must conform to sustainability tests and respect landscape status.

10.2. Policy

Policy approach

Dorset Climate Action Network

- Welcome the provision for development in villages outside local plan and neighbourhood plan boundaries.

Town and Parish Councils

- Wording and intent are appropriate.
- Absolute clarity needs to be applied to ascertain if DEV7 is the term to which 'countryside policy' is applied.
- If the term 'countryside policy' is not referenced in the NPPF and is a local reference only then this should be made clear.
- DEV7 should provide greater flexibility to allow site allocations outside DDBs.
- There should be some modest additions to the list of developments which can be considered in the rural area under Policy DEV7.
- Policy should be clearer in terms of restricting development that is "just outside" or "adjoining" the DDB.
- The policy should clarify where and at what scale development would be permitted outside development boundaries.

- Scale of development in villages needs to be balanced by maintaining local facilities, ensuring balanced demographics, having access to jobs, retaining rural character, avoiding large scale growth to keep sense of community, whilst allowing rural settlements may become more self-sufficient.
- Concern that villages will become more and more places for the retired - Plan recognises this but does not appear to offer any solutions.
- Supports the policy restrictions on development outside development boundaries and considers that the approach to development boundaries may have been applied inconsistently.

Developers/Landowners/Agents

- The current spatial strategy is not sound and contrary to the objectives of the NPPF. Focusing development at larger settlements and limiting growth at villages to within settlement boundaries or through neighbourhood plans is too restrictive. Should encourage growth within and immediately adjacent to settlement boundaries (subject to meeting other development management criteria) to enable villages to stay viable.
- Agreement with suggested approach and wording, subject to changes.
- Allowing development outside development boundaries in certain circumstances and provides clear support for a range of proposals in the countryside, is supported.
- The plan needs to be clearer about how the terms 'local plan development boundary' and 'defined development boundary' are used.
- Oppose the use of settlement boundaries to control the distribution of development.
- Policy DEV7 is silent on the circumstances when development of sites in the open countryside could be considered acceptable.
- Respondent considers that greater flexibility in Policy DEV7, allowing growth in the countryside, would make the housing land supply more robust.
- Settlement-by-settlement approach should be undertaken to determine the most appropriate site for new housing rather than a blanket approach.
- Rural sustainability will not be achieved - not consistent with tests of soundness.
- Numerous villages that will be unable to deliver a commensurate level of growth. Accumulative impacts of small levels of growth across villages - resulting considerable level of growth - keeps villages alive and play their small part.

Public response

- Queries who will define development boundaries and on what basis as there is no policy that defines them.
- Disagree - Lack of research & evidence.
- Blanket policy means numerous villages will be unable to deliver appropriate levels of growth.
- Small-scale growth across small villages could create impact across a vast area which will result in a considerable level of growth.
- Concern with developments approved just outside the DDB - query how policy can be strengthened to avoid this in future.

DEV7 First paragraph - Environmental constraints

Public response

- 'Environmental constraints .. protection of countryside' is not sufficiently robust.

DEV7 bullet point 1 - Agriculture, forestry, and horticulture

South West National Farmers Union (NFU)

- To maintain viable agricultural businesses in Dorset, the Council should seek to encourage the development of farming enterprises that can meet the challenges of food security through modernising and becoming more efficient, (remaining compliant with relevant rules and regulations), support farm businesses and their efforts to increase productivity and decrease impact on the environment, allow diversification of farm enterprises to meet new opportunities such as, for example, business units, renewable energy or tourism.

DEV7 Bullet point 3 - Employment, tourism, education and leisure

Symondsburry Parish Council

- Suggested that the growth and changes in work and living styles will result in a rethinking of employment space together with house sizes and numbers to allow more homeworking.

Developers/Landowners/Agents

- No viable use which will generate investment, create jobs, offer training, or deliver environmental enhancements should be resisted.
- Reference to estate enterprises - a different entity with a much stronger custodial role and a direct employer - much better placed to develop new and innovative business opportunities and undertake long term environmental management (referenced in the Purbeck Local Plan).

Public response

- Additional wording needed to support both new tourism facilities and extensions / improvements to existing facilities outside settlement boundaries.
- A more flexible policy in relation to development outside settlement boundaries will facilitate development that is highly beneficial for the local area and its economy.
- The need for large scale employment sites is decreasing. Vital that employment is provided within rural communities by smaller units.
- Employment land is vital for the rural economy to be sustainable.
- Confident sufficient jobs/resources will be created in Blandford to reduce commuting.

DEV7 Bullet point 4 - Affordable Housing

Dorset Climate Action Network

- Planning authority should be open to, and actively encouraging of, the provision of affordable housing wherever there is palpable need for it in villages.
- Council should support locally-rooted development in villages, carry affordable price of land.

South-West National Farmers Union (NFU)

- To maintain viable agricultural businesses in Dorset, the Council should seek to enable the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession.

Town and Parish Councils

- Clarification from Dorset Council would be useful with respect to land on the edge of the current build up area of the village being offered for social housing. If that same piece of land was put forward for commercial housing development would that be allowed?

Public response

- Restricts housing effectively to rural exception affordable housing or tourist accommodation yet in 4.2.1, providing a mix of housing types and sizes across a development helps to create inclusive communities.
- Homes in rural areas should be for affordable housing only.

DEV7 Bullet point 9 - Renewable Energy

South-West National Farmers Union (NFU)

- To maintain viable agricultural businesses in Dorset, the Council should seek to support the development of appropriate renewable energy generation which meets the needs of the businesses and/or local community – in turn supporting county wide renewable energy ambitions.

DEV7 bullet point 11 - Facilities and Services

Town and Parish Councils

- Need to provide facilities such as, play and sports grounds, community centres, modern village halls.
- Investment into more than key towns is vital if villages are to survive.
- Infrastructure (including: roads, doctors surgeries etc.) needs to be considered when assessing proposals for development outside development boundaries.
- With large expansions in adjacent parishes how will demand for GPs and schools be met in rural parishes, parents in villages such as Tarrant Monkton/Launceston will be fighting for insufficient places at schools.

DEV7 Bullet point 12 - Landscape / green infrastructure

Natural England

- Supports the principle of policy DEV7. Final bullet point should be expanded to include habitat creation and nutrient reduction requirements.

10.3. Other issues

A countryside location is required

Developers/Landowners/Agents

- Support the range of permitted development types but greater flexibility is needed for other unanticipated uses where a countryside location is required, or deliver significant economic/environmental benefits.

Homes of exceptional quality

Developers/Landowners/Agents

- Needs to reference Policy HOU57: "Homes of exceptional quality and innovative design, consistent with Policy HOU57".

Brownfield

Developers/Landowners/Agents

- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).

Rail Infrastructure

Swanage Railway

- Prohibits new railway facilities in the open countryside if PP is needed. Should modify DEV7 to include "Railway Infrastructure" or "Transportation infrastructure that cannot reasonably be accommodated within a development boundary". Some railway infrastructure can be constructed under PD rights however does not apply to construction of a station or where railway needs to expand to outside operational land.

Transport infrastructure

Symondsburry Parish Council

- Further consideration needs to be given to this shift in work life approach, not forgetting the now essentials of broadband connectivity and improvement in local/long distance physical transport links.

Tarrant Monkton & Tarrant Launceston Parish Council

- The Valley Road linking the A354 and B3082 is already a dangerous rat run, it is single lane in places and narrow in others, with serious blind corners.
- Increased traffic generation between Blandford (which lies outside the Transforming Travel Programme, 7.3.7) and Wimborne-Poole etc.

Biodiversity

Natural England

- List of exemptions should also include more general proposals whose primary purpose is to alleviate the ecological emergency through the creation, restoration, or improved management of wildlife.

Dorset Wildlife Trust

- Suggest encouraging wording in the policy to reflect policy ENV3 to support in principle "Proposals where the primary purpose is to conserve or enhance biodiversity and deliver a net gain "where this accords with other policies in the Local Plan".

Heritage

Historic England

- Add criterion: solutions for heritage at risk.

Landscape

Cranborne Chase AONB Team

- Many of those allowable developments significant landscape and environmental impacts, particularly in relation to the designated landscapes of the AONBs.

Minerals

Imerys Minerals

- Minerals are protected through national and local planning policy and so should be referred to as a constraint in Policy DEV7.
- The Council needs to determine whether the Local Plan would result in restrictive rights on the ability to work, transport, process or supply nationally and internationally important minerals in the future.
- Existing uses should not be restricted by new development proposals and applicants for new development near such facilities should provide suitable mitigation before the development has been completed. Approach reflects paragraph 182 of the NPPF and adopted Policy MS-8.

Waste

Environment Agency

- There is no mention of waste activities in the list of things that will be allowed - believe there to be landfills and other activities in these areas.

Five-year housing land supply

Developers/Landowners/Agents

- Development in villages often delivered swiftly benefitting the development industry, de-risks Council's current strategy which focuses far too heavily on a limited number of large allocations that may stall and result in the inability to demonstrate a five-year housing land supply.
- Policy wording should be amended to accommodate text in footnote 2 to allow sufficient flexibility to permit development in circumstances where the authority is falling behind on housing delivery and/or land supply.
- Presumption in favour of sustainable development should be clearly spelled out. Requires more positive and flexible policy framework including with regard to new employment and housing development in rural areas where this is supported by the local community.

Town and Parish Councils

- The proposals are excellent in theory, but many will undoubtedly to be overridden by the NPPF 'presumption in favour of sustainable development' requirement given the lack of a 5-year land supply in Dorset.

Local Housing Need

Town and Parish Councils

- Low-cost housing as well as amenity investment must be part of the Plan for villages as well as towns.
- Consideration should be given to returning more power to the local communities in determining their housing needs.
- Policies in DEV7 should not be used to allow smaller settlements to stagnate or become unviable.

Public response

- All villages should have the right to organic growth to meet local need supported by local NPs. Villages cannot become retirement centres with families priced out.

- Neighbourhood plans have a key role in meeting housing needs and should be used to help determine suitable housing numbers and locations for development.

Small sites

Public response

- Provision of small sites would keep villages alive and allow them to individually play their part in delivering housing growth.

Neighbourhood Plans

Town and Parish Councils

- This policy needs to be amended to enable Neighbourhood Plans to make site specific allocations to meet local needs, where this is appropriate.

Milton Abbas Parish Council

- Should mention the Milton Abbas neighbourhood plan - there is inconsistency where some are mentioned eg Puddletown and Bere Regis and some are not. Settlement boundary does not include changes intended to be made through neighbourhood plan and doesn't include any other neighbourhood plans with a base date of April 2019, amend.

Developers/Landowners/Agents

- The review of village settlement boundaries through the local plan process and neighbourhood plans should be encouraged.

11. Policy DEV8: The reuse of buildings outside settlement boundaries

11.1. Approach

Paragraphs 2.6.24-25 - Reuse of buildings outside settlement boundaries

Environment Agency

- 2.6.24 If the property is in a flood risk area, it should must not increase the vulnerability of the use and must install appropriate resilience and resistance measures.

Cranborne Chase AONB Team

- Issues with re-use of isolated buildings.

Town and Parish Councils

- We have concerns about the reuse of rural buildings policy including conversion of buildings to housing. In a rural Parish such as Sturminster Marshall this will lead to inappropriately located housing in very rural and unsustainable locations through constructing agricultural buildings that can then be converted.
- Agree with the approach suggested but we recommend that the wording of policy be tightened up in places.
- Reuse of rural buildings should only be permitted outside the AONB/SSSI.

- Agree with reuse of buildings outside settlement boundaries, which could take some pressure off finding cheap homes for local working families and keep them in their parishes.

Public response

- Perhaps buildings over 15 years old should only be considered for redevelopment, or a restriction on the Heritage Coast.
- Preference and encouragement should be given to their adaptation and reuse while material that is no longer required is carefully salvaged for reuse, to contribute towards net zero.
- queries whether only thinking of rural areas and barn conversions - should also use this thinking to reinhabit our towns.
- Para 2.6.24 Re-use of brownfield sites – I support the use of Brown field sites but feel the loss of wildlife habitats must be considered e.g., bat and swallow roosts.

Paragraphs 2.6.30-31 - Suitability of existing buildings

Cranborne Chase AONB Team

- Strongly advises that further attention is given to the ‘enhancement of the immediate setting’ as this can be misconstrued.

Town and Parish Councils

- Paragraph 2.6.30 - clear evidence, over a specified period of time should be provided to demonstrate redundant or disused status.
- Section 2.6.31 needs clarification to be clear how an assessment will be made on whether a building proposed for re-use is categorised as forming part of a village, hamlet or group of buildings without a development boundary in rural areas.
- Paragraph 2.6.31 – policy should include a statement that an existing building (including curtilage) will not be considered to be isolated if it adjoins a development boundary.
- Paragraph 2.6.31 - Proposals for the re-use of existing buildings will be considered on a case by case basis, which seems reasonable.

Developers/Landowners/Agents

- Considered unreasonable to require buildings to merit retention - modern rural buildings are as much an asset as a historic building and can make attractive and appropriate conversions for a range of uses - conversion can also bring about significant environmental or visual enhancement.
- If a building is in situ it already has an impact and whether converted or replaced, it is an asset that provides an opportunity for beneficial use or a potential enhancement.

Paragraph 2.6.32 - Appropriateness of the proposed use

Public response

- Support for site specific development, meeting the needs of locals and enhancing villages.

Paragraphs 2.6.33-37 - Acceptability of the scheme for reuse

Historic England

- At the end of 2.6.33 cross-refer to ENV5 and 7, which should be applied where relevant.

Cranborne Chase AONB Team

- The reference to ‘extensions’ in paragraph 2.6.35 is rather open ended and could be overly encouraging of extensions to buildings that ought to be fully capable of re-use without additions.

- Supports the thrust of paragraph 2.6.36 and recommends where extensions are permitted, Permitted Development Rights will be removed.

Town and Parish Councils

- Paragraph 2.6.34 - Measurements contained in this paragraph as guidelines should be stated clearly in the policy so there is no ambiguity over the definition of 'substantial reconstruction'.
- Welcome further guidance/clarification around the interpretation of Policy DEV8 and more specifically the assessment of whether development would make a 'positive contribution to local character'.

Minerals

Imerys Minerals

- Minerals are protected through national and local planning policy and so should be referred to as a constraint in Policy DEV8 for development outside development boundaries. Mineral resources should be safeguarded, as well as potential sites for the bulk transport, handling and processing of minerals. It should also be noted that Ball Clay resources and infrastructure in the Wareham Basin are of national and international importance.
- Prior to the next stage of the consultation process, the Council needs to determine whether the Local Plan would result in restrictive rights on the ability to work, transport, process or supply nationally and internationally important minerals in the future. These existing uses should not be restricted by new development proposals and applicants for new development near such facilities should provide suitable mitigation before the development has been completed. This approach reflects both paragraph 182 of the NPPF and Policy MS-8: Preventing Land-Use Conflict in the Bournemouth, Christchurch, Poole and Dorset Minerals Sites Plan.

Development boundary and five-year housing supply

Town and Parish Councils

- Section 2.6.38 does not reference those Neighbourhood Plans that do not define a development boundary but allocate sites so wording needs amending.
- Need to ensure that the wording includes reference to allocation of sites in a Neighbourhood Plan.

11.2. Policy

Policy Approach

Natural England

- Provided the proposal is in accordance with the environmental safeguards set out in the adopted and any future SPDs then Natural England has no concerns relating to the proposed policy.

Cranborne Chase AONB Team

- No indication in policy DEV8 that the evaluation of proposals to reuse buildings outside of settlement boundaries will be more critical within the AONBs.

Dorset Wildlife Trust

- Suggest encouraging wording in the policy to reflect policy ENV3 to support in principle “Proposals where the primary purpose is to conserve or enhance biodiversity and deliver a net gain “where this accords with other policies in the Local Plan”.
- Recommend that the policy includes seeking environmental enhancements.

Town and Parish Councils

- Recommend a guideline included in the policy relating to increase in floorspace/volume e.g. where the increase in floorspace/volume of the proposed building is 25% more than existing.
- Would like the strategy relating to the reuse of rural buildings to be reviewed and expanded with 'great care'.

Developers/Landowners/Agents

- Generally, support re-use of existing buildings in the green belt and countryside.
- Guidance in the draft Plan on the reuse of buildings is overly restrictive- will prevent redevelopment of some agricultural sites and areas of hard standing which would benefit landscape and visual qualities of countryside.
- Could be better dealt with via minor amendments to Policy HOU57.
- Policy should not just be limited to buildings that are capable of conversion without reconstruction as this could preclude the desired redevelopment of many historic buildings in a poor state of repair.

Public response

- Agree with the suggested approach, but consider that the policy could be re-drafted to include 're-building' within the scope of 're-use'.
- Employment uses should be defined so that it does not exclude elements of retail where these are ancillary.
- The demolition of sound buildings should be discouraged as wasteful of their embodied energy and hence harmful to the NetZero objective.
- Guidance in the draft LP on the reuse of buildings is overly restrictive.

Criterion I.

Developers/Landowners/Agents

- I.b needs to be more flexible to allow the conversion of a redundant building within a cluster or group of other active buildings, while the existing, primary activity of the site (for example a farm estate) continues.

Public response

- Condition 1b could be barrier to development in rural areas.

Criterion II.

Town and Parish Councils

- Clause J of the policy (which indicates that reuse of rural buildings for tourist accommodation will be permitted) is deleted.
- Drafting of the policy is not sufficiently precise (e.g. the term tourist accommodation is not defined).

Developers/Landowners/Agents

- Bullet h too narrow considering definition of employment at para 5.2.13 – could preclude other types of beneficial commercial activities.

Public response

- II.f. Support in principle, need clear definition for affordable housing.

Criterion III.

Developers/Landowners/Agents

- III.m is not clear why any proposed extension has to be “necessary to meet the essential functional requirements of the intended reuse”. It is not clear how ‘essential’ is defined or how it would be applied with consistency across the wide range of circumstances It should be re-worded to say “m. any proposed extension to the existing building is proportionate in scale. ancillary in nature; and subordinate to the main building; and;
- wording should be reviewed to ensure it is in line with paragraphs 83 and 84 of the NPPF, which seeks a “prosperous rural economy”.

Additional criteria

Environment Agency

- Add “if the building is in a flood risk area, this must not increase the vulnerability of the use and must install appropriate resilience and resistance measures”.

Historic England

- Add criterion to policy: i.e. the existing building is heritage at risk. Amend Criterion III. n. to ensure that any scheme for reuse should also enhance the setting of a building.

Developers/Landowners/Agents

- Another criterion should be added supporting the development of appropriate brownfield land (as well as buildings).

11.3. Development boundaries and five year supply

Paragraphs 2.6.38-39

Public response

- Welcomes the suggestion in paragraph 2.6.39 that Tier 4 villages are not likely to be sustainable locations and considers that allocations for higher ranked settlements should take account of infrastructure, whether the community has prepared its own neighbourhood plan and whether development is likely to be appropriate.

12. Paragraphs 2.6.40-2.6.41 - New Settlements

Support/benefits of a new settlement

Town and Parish Councils

- Suggestion to consider the option of development of a new settlement in Dorset - with housing and amenities - would lessen damage on Green Belt and wildlife.

- Any shortfall in housing provision could be addressed by construction of new communities where infrastructure could be created as needed.
- An alternative approach should be taken, looking at other locations for a new settlement.
- No substantive work appears to have been done on examining the scope for other new or significantly expanded settlements to help deliver the longer term growth needs of Dorset and how these could work within (or form new) functional areas.
- This 'new settlement' could never be sustainable unless it was large enough to support the bulk of services its population requires. Given the difficulty of getting any big project completed within a reasonable timescale this seems unrealistically ambitious. Piggybacking on an existing settlement would have a greater chance of success, rather as Poundbury has.

Developers/Landowners/Agents

- The Council's positive approach to planning new settlements to meet needs beyond the plan period is welcomed.
- We support the plan's commitment to looking beyond the Green Belt for new or significantly expanded settlements to sustainably meet Dorset's longer term growth requirements. The Government recognises the need for long lead-in times to deliver new settlements.
- The plan must provide the necessary certainty as opposed to 'kicking the can down the road' by identifying a preferred Area of Search for a new settlement, which would both augment the delivery of housing north of Dorchester towards the end of the plan period to avoid an over-reliance on one site.
- New Settlements are unlikely to deliver a meaningful supply of new homes during the plan period.

Public response

- The council should explore the option of developing a new town.
- New town would maintain Dorset's charm.
- The plan fails to propose the option of building a new town in Dorset on a greenfield site with infrastructure in place at inception - would be infinitely more acceptable and equitable.
- Suggestion that a new town should be developed to meet Dorset's need - rather than impacting on villages, the Greenbelt and its established wildlife.
- There is disagreement with the spatial strategy and it would be preferable to build a new settlement to absorb the bulk of the housing Dorset has been directed to accept.
- Growth should be focused on one or more new sustainable settlement(s), absorbing most of the new development required.
- A new town in the right location on greenfield land should be considered as an alternative to the release of Green Belt land.
- Paragraph 2.6.41 - this should read that any new settlement is REQUIRED to include infrastructure etc not just an expectation.
- More settlements and smaller settlements in Dorset should be expanded to reduce pressure on green belt land.
- There is no evidence that the option of a new settlement has been considered.
- The Council should not rush into proposing sites to meet shorter-term housing need when potential longer term solutions, such as new / expanded settlements, are being investigated.
- Respondent considers that a new town on North Dorset should include an Economic Zone with Business rate and Corporation tax relief and you will attract employment.

Disagreement/issues with proposing a new settlement

Developers/Landowners/Agents

- Concern with lead in times for new settlements, and larger allocations (new settlements are unlikely to deliver meaningful supply during the plan period).

Public response

- Suggestion that plans for a new settlement are unrealistically ambitious - piggybacking on an existing settlement would have a greater chance of success.
- Paragraphs 2.6.40-41 on 'New Settlements' seem to contradict this approach of Plan led, not developer led development - by inviting developers and landowners to advocate their own ideas for new settlements in Dorset.
- For Dorset Council to suggest that any new settlement in Dorset should be 'self-contained' is simply baffling - no settlements can be 'self-contained' so all suggestions will fail to meet this criteria.

Requirements of a new settlement

Developers/Landowners/Agents

- Long-term foresight is needed from the Council in order to secure the up-front investment to bring forward large-scale strategic growth in the form of a new settlement.
- It is critical that the Council robustly assesses all reasonable options for significant future growth within the plan area before identifying its preferred Area of Search. Hart District Council failed to undertake this process objectively, with it having pre-empted its choice of Area of Search – thus failing the soundness requirement to assess all reasonable alternatives based on proportionate evidence.
- In identifying the preferred Area of Search, the plan should clarify that this will be refined into a formal allocation through either an Area Action Plan or a Local Plan Review.

Public response

- New town could be future proofed and designed cost effectively and sustainably for the future.
- A new settlement would need to be on high frequency bus and train routes and be designed to give cyclists and pedestrians priority within the settlement.
- Suggestion of design principles for a new settlement.
- At least carbon neutral (and preferably carbon negative).
- Designed to contribute to ecological recovery and biodiversity gains of at least 15% in perpetuity.
- Designed to strengthen rather than weaken ecosystem services and existing and potential ecological networks in perpetuity.
- Designed as 'walking neighbourhoods' by following the good practices advocated in the Walking Neighbourhoods Charter.
- Planted so as to provide at least the recommended 20% urban tree canopy cover by the time the development is substantially completed.
- A new town could be designed to be sustainable with proper green transport links etc.
- Suggestion of a new village with enough infrastructure to encourage the feeling of being a new place, not dependent on its nearby town will help reduce travel.
- A new town located close to existing A roads and / or rail links would be more sensible.

Locations for a new settlement

Town and Parish Councils

- There are concerns that SHLAA submission site LA/WOOD/001 at Woodsford, Crossways was not given the same level of consideration as the proposed allocation North of Dorchester (DOR13).
- Fewer houses in Ferndown, with homes delivered in a new town in elsewhere in Dorset of at least 5,000 homes.

Developers/Landowners/Agents

- Discussions with the Council would be welcomed on the potential of land to the north of Colehill as a potential location for a stand-alone new settlement.

Public response

- Suggestion for a new town in the Motcombe / Semley area as it is well connected to road and rail.
- A new town should be built to meet needs, potentially in the Green Belt as a single release.
- A new town could be located in North Dorset, or perhaps be spread across three sites in Dorset with each having a 10-15,000 population to avoid impacting the Green Belt, although new roads and community support would be needed.

13. Figure 2.5: Strategic diagram

Dorchester Town Council

- The strategic diagram adds very little to the spatial strategy, with little definition.

Swanage Railway

- Notes that the key diagram figure 2.5 omits rail link from Norden to Wareham.

Cranborne Chase AONB Team

- Inconsistencies between the Dorset strategic diagram and the SE Dorset one in terms of the location of the AONB.

14. Meeting the housing need

Paragraph 2.7.3 - Completions

Dorchester Town Council

- Paragraph 2.7.3 highlights that past delivery has been below the target rate set in local plans, but provides no analysis as to why this is the case, which is critical to avoiding repetition of the problem.
- The housing supply shortfall in North Dorset is mainly due to delays in bringing forward the Gillingham Strategic Southern Extension. This highlights both the timescales and viability challenges of a significant town expansion.

Holwell Parish Council

- There is a lack of analysis as to why past delivery has been below the target rate set.

Milborne St Andrew Parish Council

- Section 2.7.3 highlights that past delivery has been below the target rate set in local plans, but provides no analysis as to why this is the case.

Public response

- There is no analysis to explain why past housing delivery rates have been low.
- Past under-delivery in Dorset has contributed to the current demand for homes.

Paragraphs 2.7.6 - 2.7.11, and Figure 2.6 - Housing supply from allocations at settlements in Dorset's functional areas

Town and Parish Councils

- We are concerned that the total housing number from allocations represents a shortfall from the standard method requirement.
- Not clear what an "option site" is.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Appraisal of housing numbers for Bridport - more than stated in adopted local plan, despite no new allocations - possibly due to plan period until 2038.

Developers/Landowners/Agents

- Figure 2.6. It is likely that the table omits allocations that are already adopted within existing LPs (including the emerging Purbeck Local Plan). The table / title needs to be clarified.
- Figure 2.6 - claims to show all of the proposed allocations within the DCLP - unclear which categories of allocation are included - i.e. already adopted allocations too? - needs clarification.

Public response

- The housing figures in different parts of the draft plan (Figures 2.6, 34.2 and 34.4) are confusing and appear inconsistent.
- Clarification is needed of how many new dwellings are required to be completed in the West Dorset Functional Area by the end of the Local Plan period (2038) and how many of those are expected to be completed after 1st April 2021 without any new land allocation.
- Disagreement with inclusion of Hardy Complex in Portland within housing supply - it is undeliverable.

Paragraph 2.7.13 - Neighbourhood Plans

Town and Parish Councils

- This should be a two-way process and neighbouring areas must also take that burden.

Symondsburry Parish Council

- The assessment of the number of homes needed in Dorset does not take account of the made Bridport Area Neighbourhood Plan.

Milton Abbas

- The data in Figure 2.7 includes a figure of 737 homes for sites identified in neighbourhood plans with a base date of April 2019. This suggests that data from the Milton Abbas NDP (and indeed for any other NDPs developed since April 2019) have not been included. It is therefore not

correct to say in paragraph 2.3.5 that potential development sites have been identified “from a range of other sources, including ...neighbourhood plans”.

- LA/MILT/001 and LA/MILT/005 should be removed as were rejected through the neighbourhood plan process.

Paragraph 2.7.15 - Rural Exception site

Developers/Landowners/Agents

- It is inappropriate for the council to count rural exception sites as meeting its quota of ‘small and medium sites’.

Paragraphs 2.7.17-18 - Windfall

Developers/Landowners/Agents

- Windfall allowance of 15.7% is considered disproportionately high. Windfall sites are notoriously difficult to predict, and the scale and timing of such development cannot be consistently relied upon. Should be evidenced over a 15-year period.

Paragraphs 2.7.19-21 - Unconsented major sites and small sites

Developers/Landowners/Agents

- Concern that approaches set in para 2.7.20 fails to take account of opportunities to deliver modest-scale growth at sustainable locations that would be able to meet local needs, including an element of market housing.
- The Plan should include a small sites policy, which could only apply outside the Green Belt, but which permits new homes on sites adjoining existing settlement boundaries. The number of homes on each small site reflecting the specific context, including the size and character of the town or village and should it be required, the policy could include an upper limit on the number of homes that will be permitted on any single small site around a key (Tier 1, 2 or 3) settlement could be imposed.

Dorset Wildlife Trust

- Appendix 3, Small sites - as with some of the larger sites, these areas have not all been fully assessed against biodiversity impacts prior to inclusion in this list.
- Appendix 3, Small sites - there is no map to indicate exact locations, and therefore we cannot advise in detail, however we are concerned that the list of ‘constraints’ referenced in paragraph 1.1.5 will not be complete with respect to on-site biodiversity.
- Important that ‘small sites’ are not allocated at all if there are likely to be harmful biodiversity impacts, or the number of houses planned reduced to a realistic level to start with, as the smaller level of development is likely to make avoidance and mitigation less possible than it is for a larger site.
- Further assessment should be undertaken including on-site biodiversity assessment where appropriate and sites removed from the list in Figure A3 if biodiversity harm cannot be avoided.

Appendix 3 - Small Sites

Milton Abbas Parish Council

- The Parish Council is concerned that two small sites at Milton Abbas are listed as potential affordable housing sites in Appendix 3 of the local plan. We object to their inclusion, as it is not realistic to say that they are suitable.

- Site LA/MILT/001 was ruled out on grounds of significant constraints - heritage, access issues, landscape and visual impacts.
- Site LA/MILT/005 was considered potentially suitable providing constraints could be overcome. However, there may be heritage impacts and there is a need to weigh harm against public benefits.

A site selection process was carried out for the neighbourhood plan and as a result of an independent site assessment and SEA, they were ruled out.

- The draft local plan fails to take account of the neighbourhood plan process or local character. We are also concerned that there is no reasoning behind the assumed site areas and densities proposed.

Public response

- Sites in Milton Abbas NP in Appendix 3 do not correlate with sites identified in MA NP - none of the preferred sites are included in the local plan and had different ratings to what the neighbourhood plan gave them, neither could be regarded as infill sites as per guidance for Milton Abbas on p59 of North Dorset landscape and heritage study - no connection between the LP and NP.

Symondsbury Parish Council

- LA/SYMO/ 006 Land on the north side of Sprakes Corner, Symondsbury
- Inappropriate strategic housing site. Why has this site been considered?
- This particular site is within the green corridor agreed when the consent for Vearse Farm was agreed. There will be sufficient affordable housing at Vearse Farm literally across the road. Why has this now been identified as a possible exception site?

Portland Town Council

- In reference to Islanders Club (LA/PORT/005), which is listed as a potential site for development. This site is also on a list of assets to be transferred to Portland Town Council. Portland has lost the Royal Manor Youth Club and Covid has highlighted the fact that youth services are desperately needed in Underhill and the youth resource must be retained.
- In reference to LA/PORT/004, recognises the constraints for development of Fortuneswell. Proposals to lose areas of Hambro and Fairfield car parks would therefore be strongly resisted in the absence of a wider planning solution. We would like to point out that Hambro Road car park is on a list of assets to be transferred to Portland Town Council.

Weymouth Town Council

- WTC are concerned that all the Weymouth small site are considered for housing development;
- If car parking were enabled out of the town centre, during peak times, then some sites might become available for development but not all of them (5 car parks totalling 125 homes).
- that employment sites are considered for housing rather than employment land (3 totalling 174 homes).
- that the indoor and outdoor entertainment site (as called up in the Town Centre Masterplan) is replaced by housing 64 homes not entertainment.
- the Station forecourt (18 homes) is part of WEY4 not residential.
- WTC are concerned that these are the same sites as those counted under WEY2 or Small Site Windfall.

Wyatt Homes

- The land to the south of Westleaze, Charminster identified through these representations should be included within the list of sites within Appendix 3 of the plan.

Savills on behalf of Sampson Properties

- Land at Mere Road (LA/GILL/019) measures 0.9 hectares and therefore it would be in the Council's interest to allocate this Site for development

Developers/Landowners/Agents

- One of the identified small and medium sites (SHLAA site 'LA/MILT/001' Deer Park at Milton Abbas) is not allocated in the neighbourhood plan, nor the local plan, is outside the settlement boundary and located within a Registered Park and Garden. Without an allocation in the local plan, its acceptability for development is far from guaranteed.

Public response

- Appendix 3 - List of small sites seems irrelevant to the local plan and stated housing numbers.
- The list of small sites is not accurate, for example:
 - Land north of Down Road, Pimperne (LA/PIMP/001) has an estimated capacity of 12 homes in Appendix 3, whilst the neighbourhood plan estimates the sites capacity at 15 homes;
 - Appendix 3 does not include a site to the north of Manor Farm Close, Pimperne with planning permission for 14 homes; and
 - Appendix 3 does not include a site to west of Old Bakery Close, Pimperne with an estimated capacity to deliver 15 homes.

Figure 2.7 - Housing Requirement and Land Supply for the Dorset Council Local Plan Area

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Noted that figures will be updated prior to next stages of plan production.

Town and Parish Councils

- Figure 2.7 would suggest that there is ample supply of sites coming forward to meet housing need in the plan period. The figures for 5 year housing land supply are therefore misleading.
- Query the estimates of housing land supply presented in the emerging plan - in particular how sites which are not assessed as deliverable are presented in the tables identifying housing land supply & double counting of sites referenced as existing/proposed allocations.

Developers/Landowners/Agents

- A reliance on past allocations paints an overly optimistic picture.
- Assumes all sites with planning permission will be developed within the plan period - not a sound assumption as some will lapse - most plans make an allowance for this to allow for lapsed permissions.
- The Plan will need to identify additional housing land, above and beyond the supply outlined within Figure 2.7 of the Consultation Document, in order to address the unmet needs of BCP.
- All previous council area's housing policies are out of date.
- Suggestion to include a housing trajectory as an appendix to the plan - to assist in assessing and monitoring.
- Dorset Council must review the SHLAA to ensure it represents a consistent evidence base.

- The 12,050 homes from extant planning permissions, for example, are therefore to serve existing local plan targets and not the new Dorset Local Plan.
- Beneficial if the Council made available a list of the permissions that make up the land supply as well as a record of the assessment that has been undertaken. A list of unconsented allocations and record of assessment should also be presented.
- While the Local Plan approach does offer flexibility to sites and their development it also reduces certainty for developers and those seeking develop sites.
- The fundamental priority for those delivering development is a plan that ensures and provides certainty for those delivering housing.
- A significant buffer is particularly necessary given that the Plan is largely reliant on a small number of large sites (such as site ref. DOR13) which, in the absence of any evidence the contrary, cannot be confirmed to be deliverable in full during the Plan period.
- Outline the approach the Council will take to monitoring the delivery of sites - explore the actions that could be explored to boost supply as much as possible in the first five years of the plan period.
- Current allocations are not enough to deliver the vision - need to increase figures by 50% and employment by 100%.
- Concern that plan includes allocations that are unlikely to be delivered, and are unsustainable.
- The sources of supply identified in Figure 2.7 are fundamentally flawed. The majority of the figures use a base date of April 2019, which is two years before the start of the plan period in 2021.
- Completions on the proposed 3,500 homes urban extension north of Dorchester (DOR13), probably would not start until 10 years after the anticipated adoption of the plan in 2023. This is because the average lead-in time for large sites prior to the submission of the first planning application is 3.9 years and the average planning approval period for schemes of 2,000+ dwellings is 6.1 years. Only c.800 homes could reasonably be expected to come from the north of Dorchester development. This is because the site would not start to deliver until the last five years of the plan period and at a lower rate than predicted. The claim at paragraph 23.6.28 that the site will deliver around 240 dpa seems optimistic and out of kilter with build-out rates for comparable developments of this scale, as the average annual build-out rate for schemes of 2,000+ dwellings is 161 homes.
- Three of the major allocations in the 2015 West Dorset, Weymouth and Portland Local Plan at Littlemoor, Nottingham Lane and Vearse Farm in Bridport are yet to commence six years after the plan was adopted.
- Bearing in mind the plan's housing requirement of 1,793 homes per annum, it is clear that a range of deliverable small to medium sites that can be built out quickly will be needed to demonstrate a five-year supply of 8,965 homes on adoption.
- A reliance on unrelated allocations paints a more positive picture than will be the case. Instead, additional allocations will be needed to plug the gap.
- The 12,050 homes from extant planning permissions will serve existing local plan targets and not the new Dorset Local Plan.
- The land supply from extant permissions should be reviewed as the plan progresses to avoid lapsed permissions being counted in the supply.
- A list of extant permissions should be made available.
- A list of the unconsented allocations should be made available, as well as a record of the assessment of these allocations to ensure they are still deliverable within the plan period.

- The allowance of 6,193 dwellings from minor sites of 9 dwellings or fewer is not supported by evidence.
- The surplus in sites of 8,804 could be quickly eroded if extant planning permissions are not built out or come forward more slowly.
- Unconsented rural exception sites with funding should not be included in the supply, but if they are, they should be identified.
- Figure 2.7 should be supported by a detailed list of all sources of housing supply including extant permissions, small sites, major consented sites and sites identified in neighbourhood plans.

Public response

- Council should more clearly set out the different sources of housing land supply.
- An analysis of recent house prices and the rental market reveals that the number of new homes provided recently was sufficient to meet demand.
- About 25,000 houses are bought and sold in Dorset each year, so an extra 493 new houses each year seems unlikely to alter the market.
- The housing figures are presented in a chaotic and incomprehensible manner. The plan is so confusing that it makes it difficult for anyone to comment on them.
- The plan should clearly show the number of dwellings to be built under existing planning consents (e.g., Poundbury) together with the number proposed on new allocations.
- The plan does not clearly show how many new homes are proposed on allocated sites. This is probably the first thing a resident of Dorset would want to know.
- The plan does not clearly show how the gap between the detailed and substantiated total of 24,604 homes on allocated sites and the figure for local housing need of 30,481 homes will be bridged.
- It is not clear what the 'total supply' figure of 39,285 is. Is it a target, an aspiration or a figure known to be achievable? It appears nowhere else in any of the documents.
- Completions should be counted from the start date of 2021 taking into account new builds or completions to help achieve targets.
- A windfall allowance should be included within the Tier 3 and 4 villages and rural areas.
- The number of windfall sites arising will decline as more opportunities will have been seized. Calculations need to be conservative to take this into account.

Paragraph 2.7.22 - Duty to Co-operate / Unmet housing need from neighbouring areas

Chesil Bank Parish Council

- The area should not have additional housing numbers from unmet demand from other councils. An increased housing target will exacerbate existing problems. To meet its own targets on healthy lives and reducing carbon emissions the council needs to revise its ambitious housing targets.

Gladman Homes

- As the unmet housing need from neighbouring areas has yet to be quantified, the council should make further allocations (increasing the buffer of the numbers of homes it expects to be delivered over the plan period) to help neighbouring areas meet their housing needs.
- The Council should continue to meet its responsibilities (for active, constructive and ongoing engagement on strategic matters) with neighbouring areas.

Paragraphs 2.7.24 - 2.7.25 - Five year housing land supply

Town and Parish Councils

- Dorset Council should have an objective to maintain a 5-year housing land supply at all times through the period of the Local Plan.
- The absence of a 5-year housing land supply prejudices the weight applied to neighbourhood plans in planning decisions.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Pleased with intention to address 5YHLS issues - has been a problem in the BANP area and elsewhere.

Developers/Landowners/Agents

- Importance of allocating sufficient sites through the Dorset Local Plan to ensure a rolling five-year supply on adoption of the plan.
- Concern with calculation of a five year housing supply for the whole of the Council area only, should also reflect the four functional areas - Such an approach will ensure that housing can be delivered where it is needed in a sustainable way.
- The Council may wish to consider creating a new policy setting out its approach to calculating the five year housing land supply position.
- Allocating smaller sites, particularly in the Tier 3 settlements can also assist in ensuring a five-year housing supply.
- The number of housing allocations should ensure that a five-year housing land supply can be maintained over the plan period in order to meet the housing requirement.
- The effect of the Corona virus pandemic on the housebuilding industry may have implications for the deliverability of the five-year housing land supply. Delays are likely and undersupply may occur.
- In relation to the 5-year housing land supply a 20% buffer would ensure that the plan is future proofed and provide flexibility, choice and competition in the housing market reflecting Government guidance.
- Bearing in mind the annual housing requirement of 1,793 homes, it is clear that to demonstrate a five-year supply of 8,965 homes on adoption of the plan, a range of small to medium sites that can be built out quickly will be needed.

Public response

- DC should have objective to maintain 5yhls at all times throughout plan period - prejudices weight applied to neighbourhood plans in planning decisions - not realistic to expect parish to review plans after 2 years.
- The Council will need to address a shortfall in delivery within the initial years of the plan period. The Council should therefore plan for at least 17 years' worth of additional supply and have a buffer of sites.
- The Council's attempts to identify a five-year housing land supply are welcomed.
- The problems of maintaining a five-year housing land supply are likely to be exacerbated rather than relieved by the plan.
- An artificially high housing target will create a developer-led planning policy that will cause a breakdown of the five-year housing land supply target.
- The excessive and unrealistic projections could lead to proposed developments not being delivered, and land not being brought forward and the five-year land supply not being met. The

Local Plan and associated Neighbourhood Plans could then fail and result in a developer-led free for all.

- The Council should accept the constraints on sites in Dorset, argue for a lower housing target (still meeting projected need) and set a lower five-year housing land supply requirement.

Housing Delivery

Town and Parish Councils

- Action should be taken against developers with consents not being built.
- A number of the sites proposed within the Local Plan, including the North Dorchester proposals, are those that have been considered as unsustainable / unsuitable options as part of the SHLAA assessment.
- Unclear how the housing figures for the functional areas have been calculated.
- Assumption is that because the rate of completions is below the local plan target more sites have to be found – query whether do not attract funding/developers, are slow in completing or are left extant with no development are left within the overall calculations so that they are as accurate as possible?
- Query why is the table showing a 0 against option sites within the table when there are additional sites available?
- There should surely be details of when sites, particularly allocated sites, might come forward for development and how this will affect 5 year land supply going forward during the plan period.
- The wording of policy places undue expectations on the delivery of housing and we could find ourselves without a 5-year housing land supply.
- The policy should reflect / recognise the need for housing and employment to be delivered in a timely fashion – the delivery of one without the other would be unsustainable.
- The actual delivery of housing is not within the control of Dorset Council or local communities. The wording should be changed to reflect this.
- There is a lack of evidence, based on the Council's past experience, that the proposed housing numbers can be delivered.

Loders Parish Council

- The housing target must be capable of implementation so that areas such as Loders Parish can grow incrementally and sustainably in accordance with the Loders Neighbourhood Plan.

Natural England

- The policy takes no account of the deliverability of the quantum of development proposed. Significant areas of Dorset are covered by AONBs that limit the scope for significant development. Large areas of the county also have other environmental constraints that will make sustainable development difficult to achieve.

Dorset Action

- Do more to use current homes/buildings that are empty.
- Housing near jobs, schools, health care and other community facilities
- Deal with those developments that already have planning permission but where developers are holding onto the land and not building.

Weymouth Civic Society

- Strong objections to the development of sites listed in Appendix 3, which comprise many of the main car parks in the town centre and periphery.

Dorset Local Nature Partnership

- Viability of sites needs to be assessed prior to allocation, to ensure that they will be able to meet all policies.
- Recommend that there is consistency across allocation policies in terms of detail:
- Biodiversity site surveys to be undertaken on sites and SANGs at the allocation stage.
- The location details and viability of SANGs to be agreed prior to all site allocation.
- All sites should include details of the development and greenspace locations to clearly set out what will be delivered.

Developers/Landowners/Agents

- The draft plan underestimates the amount of dwellings required and over supplies housing in areas that aren't as sustainable or accessible.
- Counter intuitive to propose development in the Green Belt or close to Heathlands when this land is available and free of constraints.
- Wimborne / Colehill is one of the most logical locations to achieve unmet need from New Forest and BCP.
- Importance of allocating sufficient sites through the Dorset Local Plan to ensure a rolling five-year supply on adoption of the plan.
- To aid delivery, the housing land supply should include the allocation of small to medium-sized sites that can be built out quickly. The lead in time for new settlements can be very significant, the housing supply needs to include a range of small to medium sites that can be built out quickly.
- Concern with being too optimistic about build-out rates – reference to the findings of the Lichfield 'Start to Finish' report.
- The Plan underestimates the probable difficulty in bringing some of the proposed sites forward.
- It is not clear whether the provision of housing takes into account the likelihood of the delivery of the housing supply.
- Existing and proposed allocations should be presented as two separate sources of supply and that realistic assumptions (taking account of slippage and to provide contingency) are used to estimate delivery.
- Outline its approach to monitoring delivery of sites (including any actions to boost supply and housing delivery pending adoption of the new local plan).
- Paragraph 68a of the NPPF does not envisage that the 10% of homes to be planned at small sites would comprise only windfalls, brownfield redevelopment or affordable housing delivered at rural exception sites - expectation that all types of housing need to be met, including for market homes.
- The timeline is very challenging so there is a need to be alert to any deliverability issues that may delay plan making - particularly regarding strategic sites that will be fundamental to soundness.

Public response

- Average completion rate is down to developers not the council - plenty consents been given, queries how pressing need to identify more land.
- Avoid building houses regardless of whether work is available. Local people need affordable housing, in keeping with the low-paid and seasonal nature of work associated with the tourist industry.
- Need to provide employment before housing.

- UK has failed to reach its housing quotas in recent decades, often due to lack of builders and skilled workers - shortage is likely to be significantly exacerbated by the return of skilled labour to Europe.
- There is no statistical data provided on housing relating to existing permissions, allocations, brownfield sites, windfall and council owned sites.
- The potential for housing on allocated sites should be optimised.
- It is not clear where the money to fund all this development will come from.
- The plan will underdeliver and fall short of the housing land supply and housing delivery targets very soon after adoption.
- The plan ignores the assertions of the Government's 'build back better' plan for growth.
- Growth in villages such as Crossways / Moreton and Alderholt will require the delivery of significant new infrastructure and will only provide housing in the later part of the plan period. The existing main settlements are more likely to offer short term housing growth to meet needs now.

Housing for specific needs

Developers/Landowners/Agents

- The provision of Market and Affordable Extra Care Housing will be required to increase by 776 units to meet demand by 2035.
- The current provision of Extra Care Housing does not meet the need for such accommodation, with this gap expected to significantly worsen over time.
- Need to include a clear policy to address older person housing needs, based on the findings of the attached Contact Consulting Report.
- The evidence base must be updated to properly reflect the age profile of the area and the current, and predicted need for different tenures and typologies through the provision of an older persons housing need assessment.
- Policy WEY15, extra care homes are generally considered to be C2 and not C3 units, and it appears that these 75 units should not be used in calculations for housing land supply.
- Building family homes not appropriate as largest increase in population will be over 75s - will lead to second homes.

Local needs and affordability

Town and Parish Councils

- Dorset are being asked to deliver a supply of housing land to accommodate 30,481 dwellings – how can those dwellings be protected for Dorset or local residents with the increasing trend in second home ownership.
- The actual need is for dwellings for elderly people living in couples or alone, in easy reach of facilities such as doctor's surgeries, shops etc.
- Should provide a breakdown of the proportion of homes required to meet the needs of older people, for single storey homes for independent living (including park homes). The Council should not just plan for those in need of care.
- Building housing which is attractive to the over 75s in the right location will free up larger properties for younger age groups, reducing the need to build on the Green Belt to meet the wrong type of housing need.

- Lobby the Government (with other affected areas) to limit the numbers of second homes in areas of housing shortage and particularly in AONBs either by legislative powers or taxation so that more building is not required.
- First-time buyers needs are not being met.
- Housing is needed for local people, who are priced out of the market - Dorset needs to retain the younger population to ensure its prosperity in the future.
- It is not clear how the Council will balance the local need for affordable housing versus migration from other parts of England so that local people on minimum wages or key workers are not disadvantaged.
- There are inadequate controls in the plan to deliver a high proportion of affordable housing.
- The new homes proposed are not for local people and would not be affordable.
- The 2017 White Paper spoke of building more houses to stabilise prices. It is questionable whether developers are expected to build 47% more houses than projected household numbers for 17 years, in order to stabilise prices.
- The approach does not address the need for suitable homes, including affordable one and two bedroom accommodation for young people and older retirees downsizing.
- If need is based on inflated rates of net migration and other factors it will result in unaffordable housing for local people.
- There is no mention of social housing and low rent units for those on lower incomes.
- Communities need affordable housing built to high environmental standards, minimising their carbon footprint and making sure homes are warm and secure.

Dorset Action

- Stop building developments just for people to come and buy to invest, it doesn't meet local need, it pushes up housing prices.
- Define exactly what is meant by 'affordable housing'.

Dorset Climate Action Network

- At a time of low interest rates and the rising desire of people to retire to the County or to find second homes here, there is no reason to suppose that building more houses will lower the price of houses.

West Dorset CPRE

- Need to support rural communities and our market towns – an approach that does not rely on large and unsustainable housing sites on greenfield land.
- Concern with too few affordable homes.
- Concern with too many second homes.
- Far too few homes for local population and its need.
- Need for more emphasis on setting up Community Land Trusts and acquiring land.
- Council should look to build Council Houses and business start-up units to provide the right foundations for the future.

CPRE: Portland & Poole

- The plan should make provision for truly affordable housing of the right quantities in the right places for local working families

Weymouth Civic Society

- Concerned at the way the Strategic Housing and Economic Land Availability Assessment (SHLAA) is used to provide housing site proposals in the plan.

Public response

- Affordable housing and AH/commercial housing mix should be opposed by the council in Tier 4 villages unless Parish Councils support.
- Meet housing needs through the use of Community Land Trusts.
- Very important that the Council encourages and initiates local projects for local needs.
- The aspiration that those who grow up in Dorset should be enabled to stay is a good one.
- The Council should focus on encouraging affordable housing for younger people and taking people off local housing lists.
- Demand for homes is inflating house prices.
- There is already a scramble to obtain land or 'options to buy' on sites identified in the plan, forcing up land and house prices.
- Recent developments across Dorset have not resulted in lower house prices – supply needs to increase massively ahead of demand.
- There's a need for small-scale developments of housing in the rented sector.
- The freeing-up of land in the County will push up land prices. This will also push up new build prices even further out of the reach of many local people. The result will be an influx of more people from outside Dorset who can afford the houses.

Alternative approaches/options

Town and Parish Councils

- The draft plan has not fully explored other options that may be more sustainable.
- There are many empty houses in Dorset and BCP. The Councils should try to see if and how these could be brought into use.
- Reference to para 123 of the NPPF and the importance of achieving a significant uplift in the average density of residential development in city and town centres.
- Plan makes reference to the scope for higher densities in town centres and at other locations well served by public transport – but there is little evidence on what has been researched and the conclusions reached.
- There may be potential for housing development in town centres and not necessarily more challenging than a major new greenfield development that has no infrastructure, and should be far more sustainable in the long term.

Dorset CPRE

- Dorset Council should reassess its approach to site allocations to give greater priority to avoiding harm (rather than accepting harm on the basis that it may be able to offset this through mitigation or compensation measures).

Public response

- The draft plan does not comply with directives in the NPPF requiring the consideration of alternative strategies.
- More development options should be presented in the local plan.
- It is not clear why potential alternative approaches to meeting the housing requirement haven't been referenced in the plan.

Brownfield development

Town and Parish Councils

- Policies to concentrate housing and employment development in existing urban settlements is supported, with a strong preference for new development to be directed to brownfield sites with more encouragement for re-use and re-purposing of existing buildings.
- Brownfield sites and infilling should be identified and used before any other areas.
- It is not clear how much brownfield land is being made use of.
- There is little evidence on what has been researched.
- It is not clear whether the option of planning for higher densities in town centres and for development in other locations served by public transport has been considered.
- Under-used retail space could be converted to residential to reduce the need for new development. However high streets must remain interesting and vibrant and not fragmented by residential units.

Dorset Action

- Brownfield sites should always be used first.

Public response

- The Council should focus delivering homes on previously developed land.
- If this number of houses are really required, we should prioritise brownfield sites and the redevelopment of existing buildings and sites.
- Brownfield sites should be used for development before any further inroads are made into the AONB.
- Brownfield sites must be prioritised over development on Green Belt land.
- The approach in Dorset should be to veto further major development allowing smaller, considered plans for building within settlements. This approach would allow Dorset to meet its statutory obligations both for house building and climate change.
- There has been a dramatic effect on town centres with consumers switching to internet shopping. This has not been taken into account in the draft plan and will lead to a need to regenerate brownfield sites for housing in city centres.
- The analysis must incorporate the use of retail premises, brownfield sites, unused Council and military property, as well as a clear analysis of the future employment trends.
- The brownfield land register may not be fine-grained enough to make clear the level of disuse already in our town centres from redundant buildings and rotting upper floors in shopping areas.

Large Settlement Expansion

Dorchester Town Council

- No substantive work appears to have been done on examining the scope for other new or significantly expanded settlements to help deliver the longer term growth needs of Dorset and how these could work within (or form new) function areas.

Developers/Landowners/Agents

- The need for a long-term vision for large scale development.

Public response

- Potential new town sites have been omitted - Crossways/Moreton/North Woodsford, Land in north Dorset adjoining railway and A303.

Sustainability

Natural England

- The supporting text should make it clear that the policy does not override the sustainability requirements of the local plan, including those addressing the climate and ecological emergency. The Council could address these issues by defining the 'deliverable supply of housing land' as land that fully meets the sustainable development policies set out in the plan.

Town and Parish Councils

- 94.4% of households in Dorset are within 30 mins public transport to an employment centre, - statement needs evidence.
- New homes and jobs should have a minimum travel time. Rail service should be backbone of a sustainable plan - housing should be aligned along that infrastructure. No reference to Brexit and falling demand. Increase in employment does not justify number of houses proposed - housing will just bring in migration.
- Emphasis on large scale building on medium sized villages will create imbalance between dwellings and public facilities - new settlements maybe better.

Public response

- Suggests a co-ordinated approach to enhancing sustainability (referencing land use, agriculture, generating renewable energy, sustainable construction/design, making most of existing places and 'celebrating brownfield development').
- Potential for towns such as Bridport to be sustainable models for Eco-Towns.

Other - Monitoring and reporting

Public response

- The local plan does not include any references to monitoring and reporting, it should spell out how council intends to measure the delivery of the Plan and how local people can continue to engage with its implementation and review.
- The Plan should include timescales for delivering the changes needed.

14.1. Impacts of meeting the housing need

General

Historic England

- It is not clear what heritage impact assessment work has been undertaken to assess the suitability and capacity of: unconsented major sites, including those in Appendix 3; new settlements; and allocations in neighbourhood plans. The selection of these sites should be informed by a comprehensive and up-to-date historic environment evidence base.

Biodiversity and Environment

RSPB

- It is important to map the proposed areas of development within individual allocations – would help to understand more clearly the spatial relationship between the development footprint and adjacent areas of wildlife importance.

- General concern about the adequacy of habitat survey data to help inform the draft allocations – evidence that some sites support valuable existing areas of wildlife habitat, notably unimproved neutral grassland, and that this may not have been factored into the siting of some allocations.

West Dorset CPRE

- Concern with approach to development of greenfield land.

Dorset Climate Action Network

- The proposals in the plan mean that the Council would not be able to keep its pledge to ‘ensure that all new development incorporates ecological net gain’.

Public response

- Need to improve the green environment rather than fulfil central government directive to build houses that aren't needed locally.
- We need to protect public spaces & gaps in our towns and prevent continuous in-filling.

Character, landscape, and heritage impacts

Town and Parish Councils

- Concerns with the approach and a need to protect rural areas.
- We are concerned about the loss of green fields.
- Need to protect landscapes.
- There are concerns with major development proposed in the AONB. Meeting housing need is never a reason to cause unacceptable harm to landscapes.
- Urban sprawl risks subsuming smaller communities so that they lose their unique identities.

Natural England

- The supporting text should make it clear that the policy does not override the sustainability requirements of the local plan, including those addressing the climate and ecological emergency. The Council could address these issues by defining the ‘deliverable supply of housing land’ as land that fully meets the sustainable development policies set out in the plan.

Dorset Action

- Don't build huge new developments on natural flood plains or areas of beauty - Build to sustain our villages.

Dorset AONB Team

- Council should undertake a further review of SHLAA sites - AONB team identified sites that are unlikely to be supported on landscape harm, or density should be reduced; numerous alternative greenfield sites suggested in sensitive location where SHLAA has not sufficiently considered deliverability of housing numbers in relation to landscape and visual sensitivity.
- Major development should not be permitted in AONBs unless there are exceptional circumstances.

Dorset Climate Action Network

- There are concerns that the proposed growth strategy will damage to the County's heritage.
- The Plan needs to draw back from incursions into the AONB.

Historic England

- It is not clear what heritage impact assessment work has been undertaken to assess the suitability and capacity of: unconsented major sites, including those in Appendix 3; new settlements; and allocations in neighbourhood plans. The selection of these sites should be informed by a comprehensive and up-to-date historic environment evidence base.

Public response

- The volume of development will have a negative impact on the attractiveness of Dorset.
- Overall concern with the level of growth in comparison to the size of existing settlements.
- The scale of development will diminish the rural nature of the County.
- The impacts on the rural nature of Dorset would be worse if Dorset Council had to accept the unmet need from neighbouring counties.
- Growth will have an adverse impact on the environment, which the plan seeks to preserve.
- Development potential is severely restricted on two-thirds of the Dorset Council area, perhaps more if flood risk is considered. The plan conflicts with sustainability, increasing the flood risk, other environmental issues and removing much needed agricultural land.
- There are concerns with how the protection of Dorset's environment and natural capital, its ecological and heritage assets, might be impacted by such a level of growth.
- It is not clear whether the Council has properly considered the environmental implications of making housing allocations to address needs.
- The Council must consider the huge impact on the environment of building additional houses, not needed for actual local needs.
- The increased 'human imprint' of the proposed housing will have unacceptable impacts on carbon generation.
- Housing need should be re-calculated so that some proposed allocations can be deleted and the Council can truly respond to the aims in Section 1 of the plan to avoid further harm to the natural environment and provide more scope for nature recovery.
- The proposed level of growth will cause light pollution.
- The number of greenfield preferred sites should be reduced to maintain the beauty and heritage of Dorset, and to meet the needs of local people, not second homeowners.
- Concern with impacts of AONB - meeting housing need is never a reason to cause unacceptable harm to such places.
- Large areas of AONB in Dorset will make meeting Government housing targets challenging.

Green Belt

Cheselbourne Parish Council

- Meeting housing need is never a reason to cause unacceptable harm to the Green Belt.

Public response

- We should trust the experts to release Green Belt land and build communities.
- The housing numbers pose a risk to the Green Belt and meeting housing need is never a reason to cause unacceptable harm to such places.

Infrastructure Requirements

Town and Parish Councils

- Sites promoted need to be supported by sound infrastructure requirements so they are developed according to the plans and not just huge areas of housing.
- There is no reference to the intended new infrastructure needed to facilitate these extra homes.
- Lack of assessment of infrastructure capacity and provision.
- Infrastructure should be delivered in a timely fashion.

Holwell Parish Council

- It is important to analyse infrastructure requirements, for example at Sherborne, that will be needed to support all the villages in the Sherborne rural area as parish facilities and infrastructure declines and disappears.

Public response

- There is concern with the increased pressure on infrastructure. The approach means there is a high chance that building will get ahead of any wider infrastructure needs.
- Housing targets ridiculous given lack of investment in infrastructure, roads, schools, hospitals and rail etc. been little A31/A35 investment and latest SW rail improvements ignored London-Weymouth line.
- The approach would not deliver the critical mass of population necessary to enhance the infrastructure of the area.
- It is disappointing that that the provision / capacity of infrastructure has not been determined.
- Overarching policy on housing and employment fails to recognise the need for infrastructure to be delivered in a timely, coordinated manner.
- There is no indication of how much land will be required for schools, services etc.
- Concern with impacts of developments on the road infrastructure, creating more congestion.
- Concern with the capacity of the road infrastructure to meet the housing need.
- Traffic congestion will place constraints on substantial developments.
- There is insufficient car parking in towns.

15. Meeting the employment need

General comments on the approach

Town and Parish Councils

- Support for the approach.
- More interaction with employers is required.

Developers/Landowners/Agents

- We note the reference at paragraph 5.1.6 to the impacts on the economy of climate change, Brexit and the Covid-19 pandemic. We agree that further work is required – there will be problems and opportunities. We would like to position the Estate and, more generally, the rural economy, to succeed and transform in this challenging context. A flexible approach is key. We feel that the draft Plan needs much more, in fact a whole sub-section and a new policy, on rural enterprise and innovation.
- It is unclear in the emerging plan how the spatial strategy for delivering employment land has been derived. (The earlier 2016 Workspace Strategy does not consider the revised functional

areas presented in the local plan, and the 2020 Workspace Strategy does not make any recommendations around the distribution of jobs across the council area).

Public response

- General concern with the quality of employment in the area.
- The Plan needs to include robust strategies to attract employers to centres of significant population growth.
- Why is Swanage and the former PDC area excluded from this section?
- It is easy to identify employment land, much less easy to attract employment opportunities.
- Approach does not provide a long term solution.
- The identification of options for development to meet employment needs is supported.

Paragraph 2.8.1 - Employment need

Town and Parish Councils

- Need for well paid jobs.
- Need to recognise that sites in some areas will also contribute to meeting the needs of neighbouring areas especially where strategic sites (such as Dorset Innovation Park) are identified.
- There is little evidence of need for employment land – more work is needed.
- There will be a reduction in employment this year which may extend for 2 to 3 years before the economy hopefully recovers.
- Forecasts of rising employment above current levels are some years in the future.

Developers/Landowners/Agents

- The overall level of employment land that will be required within the BCP area, which according to the Workspace Evidence Strategy Update (Jan 2020) could be as much as 91 hectares of land.
- There is no certainty that the BCP Local Plan will be able to meet this level of provision and so it is important that the DCLP takes every opportunity to deliver at least some employment land within areas close to the BCP boundary.
- Within the Workspace Evidence Strategy Update, it is clear that a large majority of the employment land needed over the plan period is for industrial floorspace.
- This need will include a need for smaller-scale light-industry units and workshops for small businesses.

Public response

- Need should be reassessed in light of increased home working.
- The employment sites are only needed if the rate of housing increases.
- The new employment target is too low for the number of houses being built.
- Concern with lack of research and evidence.
- The policy does not state what sectors the forecast new jobs will be in and therefore whether the location of the proposed land is appropriate.
- Employment opportunities are very limited and recent planning decisions by the Council will lead to reduced local employment opportunities.
- Importance of providing opportunities for allowing businesses to grow.
- Lack of information on how businesses might grow.
- Increase in A.I. or other technology replacing certain roles.
- Loss of retail jobs that won't be replaced.

- Jobs will disappear as banks and professional service companies withdraw from the high street.
- Driving jobs will decline as, for example, will jobs in garages.
- Lack of analysis of what other employment opportunities will replace existing ones in decline.
- Smaller units within the community and possibly live/work units are needed.
- Concern with low wage/low opportunity retail being allowed for employment sites (like Mercery Rd Weymouth).
- Parking areas on existing industrial estates could be developed if parking was placed within the building; bike storage included to encourage cycling to work. This would have an impact on the area's roads.
- Need to look at whether industrial estates should be extended, factoring in: many businesses have folded, many people are working from home, office space requirements are less.

Figure 2.9 - Employment Land Supply for the Local Plan Area to 2038

Developers/Landowners/Agents

- Figure 2.9 of the consultation document indicates supply in the region of 214.75ha - providing a generous surplus relative to the ambitious 20% scenario. This seems somewhat unnecessary and a potential sub-optimal use of land that could be more effectively used for other purposes.
- Respondent considers that there is an oversupply of employment land in the northern Dorset functional area (the Functional Economic Market Area in this part of Dorset does not necessarily follow the administrative boundaries of the council areas) taking account of earlier allocations in existing development plans (including local and neighbourhood plans).
- Lack of market interest for B Use Class developments in the northern Dorset functional area.
- The employment land allocations for the northern Dorset functional area have not been justified with evidence.
- Over provision of employment land allocations in the northern Dorset functional area could lead to unsustainable patterns of travel.
- The distribution of employment land allocations has not been properly justified.

Public response

- Why are completions in 2018/2019 and 2019/2020 included in the supply of Employment Land whilst completions in Housing supply are ignored?

Paragraphs 2.8.4 - 2.8.5 and Figure 2.10 - Employment land allocations

Town and Parish Councils

- There is no employment land allocation in any of the Tier 4 settlements.

Portland Town Council

- Figure 2.10 - All of the strategic employment sites on Portland (Portland Port area, Southwell Business Park, Inmosthay / Tradecroft / Albion Stone area / Stone Firms, Ltd. and Easton (as a Town Centre) are omitted from this schedule, but we believe they should be included - see paragraph 26.3.1 of the plan for sites.

Developers/Landowners/Agents

- It is of concern that Figure 2.10 does not include any employment allocations at locations which are at the very top of the Dorset Settlement Hierarchy (i.e. at Upton and Corfe Mullen).

- The spatial strategy for Dorset's employment sites (new and existing) must provide opportunity for a diversity of sectors, employment types, skill levels, enterprise sizes, and in the right locations.
- The Local Plan should recognise the needs of a wide range of businesses types, with a wide geographic distribution of appropriate premises and not focus on retail and the service sector.

Aldi

- The council needs to undertake further consideration of the potential uses for allocated employment sites, recognising that retail is an important contributor and critical element to the economy and employment generation and should be supported.

Public response

- Need to ensure appropriate distribution of employment sites - note that South East Dorset's growth is reliant on Dorset Innovation Park (DIP). DIP serves both SED and Central Dorset and therefore the extent that it meets SED needs is limited.
- It is necessary to be sure that there is a clear idea of likely employment locations for large new developments - currently unclear.
- Support for the development of employment sites distributed across the Dorset Council area rather than concentrated into urban/suburban space.
- Employment allocations should be directed to areas where there is an imbalance of homes/workplaces.
- Concentration of employment land allocation around existing town centres could exacerbate the use of motor transport for employees.
- A new town could meet employment needs.
- Important that the countryside is not purely for dormitories and tourism.
- Need to permit smaller employment land sites outside close to town locations which could provide more sustainable uses, and reduce car and public transport reliance.
- There are no new key employment sites and no plans to increase local employment so therefore there is no correlation between employment and housing.
- Larger sites such as the Dorset Innovation Park need to be balanced with smaller employment sites within the rural communities such as farm diversification projects - requires improvement in infrastructure - such as high-speed broadband and traffic links.

Figure 2.10 - Employment land allocations

Wareham St Martin Parish Council

- Wareham St Martin Parish Council support the expansion of Holton Heath Trading Park because most traffic will go towards Poole and Bournemouth not Wareham and Sandford.
- Traffic congestion is a major issue in Sandford and road signage should encourage drivers to avoid the A351.

Portland Town Council

- Believe that strategic employment sites on Portland should be included in Figure 2.10: Employment Allocated sites across Dorset.
- Paragraph 26.3.1 establishes the importance of these sites. Should include: Portland Port area, Southwell Business Park, Osprey Quay, Inmosthay / Tradecroft / Albion Stone area / Stone Firms, Ltd., Easton (as a Town Centre). Connectivity to the Portland Tesco site and Easton area should be considered.

Aldi

- The council needs to undertake further consideration of the potential uses for allocated employment sites, recognising that retail is an important contributor and critical element to the economy and employment generation and should be supported.

Sherborne Castle Estate

- Support the minimum levels of employment growth proposed in the local plan for Sherborne.

Persimmon Homes South Coast

- A total of 31ha of employment land is proposed in the northern functional area. As a proportion of the overall identified need set out in the Workspace Strategy, this represents 20.5 – 23.7% of the whole plan's needs. This seems disproportionate in light of the fact the Northern Dorset Functional Area is mooted to deliver only 4,359 of the 30,481 homes required, which represents 14.3% of the plan target.

Public response

- The employment sites are shown on the maps but without labels or indicating which ones they are in the listings. Although the areas are noted there is no indication of the sort of development, access or other details. This doesn't allow for the judgement of their impacts.
- Query is it a list of available sites rather than a strategic plan to provide the desired highly skilled jobs?

Blandford

- Insufficient evidence that the plan will see the expansion of employment opportunities in Blandford area for the increased population proposed - will increase commuting.

Dorchester

- The plan appears to assume that the number of jobs within Dorchester won't change - lack of evidence for this.
- Notwithstanding the likelihood of some growth in jobs at Dorchester hospital, the likelihood is that jobs overall will fall.
- Reference to commercial sites vacant in Poundbury in March 2021.
- Poundbury is a modern successful model for integrating employment and housing and can be adapted to other locations.

Piddlehinton

- Query why has the former army camp at Piddlehinton not been registered as a brownfield site?
- The area immediately to the northeast of the Piddlehinton Enterprise Park is unproductive and ideal to create further employment use.

Portland

- Portland Port should be used to deliver high end maritime research, not houses.
- A new road or light railway is needed to improve access to Portland.

Sturminster Marshall

- More employment land at Sturminster Marshall will lead to increased CO2 emissions as people will have to travel to a village rather than using public transport in towns.

Swanage

- No further employment land opportunities in Swanage.
- The wide disparity between out-commuting from and in-commuting into Swanage demonstrates the need for improving employment opportunities in the town.
- There is anecdotal evidence that young Swanage people who go to university do not return owing to the lack of job opportunities and the unaffordability of local housing.

Weymouth

- Query why is there not extra employment land proposed in Weymouth, when there are thousands of extra homes proposed.
- Insufficient land is allocated at the Northern end of Weymouth, the Granby and Mount Pleasant. These areas have good access and should be developed further to improve distribution of job opportunities.
- Weymouth/Portland should bid for Freeport status.
- Site at Bincombe should be used to deliver high end maritime research, not houses.
- Need to attract new technologies and high salary jobs to prevent Weymouth remaining a seasonal, low end resort with low pay and social problems.
- Weymouth/Portland should bid for Freeport status.

Wimborne

- Just 2 hectares of employment land are proposed at Wimborne, despite more housing being planned.
- It is unclear if Dorset Council considers the stability of employment in the area to be sound.

Winfrith

- Disagreement with relying on Winfrith as a key employment location - the site is not where employers want to be as access is not good enough.

Types of employment provision

Local environmental groups (non-statutory)

- The Council should look to build business start-up units to provide the right foundations for the future.

Public response

- Lack of vision for kinds of employment growth for the area.
- Policy needs to reflect that employment is changing, in part due to the pandemic, but also with the increasing use of technology to enable different ways of working.
- Highly employable, higher-skilled local population would require jobs in sectors outside of farming and tourism and the plan does not state how this would be achieved.
- Concern that highly employable, higher-skilled local population would need to commute outside of Dorset – failing to meet the objective of transitioning to a lower carbon economy.
- Stick to the designated uses for the proposed areas.
- Need for greater emphasis on work hubs/mixed use developments.
- Suggest community workspaces to accommodate those who have little option but to work away from the office, and who cannot for various reasons work from their homes.

- Shared community workspace has been successful when of sufficient scale and part of wider development.
- Industrial units could go up rather than out and include parking within the building, either below ground or above production areas and also leisure facilities for employees.
- Lack of discussion of specific industries that could be attracted to the area - associated agricultural research, green technology, medical research, hospitals.
- Increase in out of office and home working.
- Suggested focus on Eco Tourism/renewable energy/support for trades apprenticeships.
- In addition to tourism, need to focus on all year round employment.
- There is too much reliance in the plan for tourism to provide employment.
- The plan fails to recognise how development facilitates opportunities across all sectors of the economy, including tourism.
- There is a need for well-equipped and flexible workspace suitable for the modern world.

Other strategies and evidence

Portland Port

- The Western Dorset Economic Growth Strategy (2017 – 2033) should play a key and central role in the overall economic strategy.

Developers/Landowners/Agents

- Welcome the Council's ambitions for economic growth, however it is important to ensure that evidence on employment land is sufficiently aligned with housing needs evidence.

Public response

- General concern with the quality of employment in the area.
- The Plan needs to include robust strategies to attract employers to centres of significant population growth.
- Why is Swanage and the former PDC area excluded from this section?
- It is easy to identify employment land, much less easy to attract employment opportunities.
- Approach does not provide a long term solution.

Additional policies

Local environmental groups (non-statutory)

- Unclear if there is any current or planned policy regarding vacant and derelict sites within an existing employment allocation.
- Would be helpful to establish the criteria for mixed use development and what subsequent changes would be acceptable if a developer wants to alter things.

Infrastructure

Town and Parish Councils

- Sites should only be brought forward with the infrastructure (roads and telecomms) provided at the time of or prior to development.
- Infrastructure and facilities should be delivered in step with employment land development.

Sport England

- New employment sites should not be at the expense of site current used for sport, whether or not they have been used in the last 5 years.

Public response

- Approach fails to consider infrastructure and transport adequately.
- Internet connectivity an important drive for jobs in Dorset.
- Bike storage should be included to encourage cycling to work. This would have an impact on the area's roads.
- Large industrial units are unlikely to attract commercial interest to more rural areas due to the lack of a transport network.

Impacts of the Covid-19 Pandemic and Brexit

Town and Parish Councils

- There is insufficient discussion of the impact of the pandemic on employment.
- Future of employment needs have been significantly affected by change due to covid and Brexit – these need to be considered.

Local community groups (non-statutory)

- Impact of Covid-19 Pandemic and Brexit on smaller businesses is unknown.

Public response

- Query whether estimates of the need for employment land take account of the pandemic – approach needs to be refreshed in light of these issues.

Climate Change

Town and Parish Councils

- Location of strategic employment sites will have an effect on transportation and climate change.

Public response

- 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.
- All buildings should contribute towards achieving a net zero greenhouse gas emissions target.
- In the interests of climate change, employment allocations should be directed to areas where there is an imbalance of homes/workplaces.
- Concern that the approach in terms of travel from new housing to new employment means Climate and Ecological Emergency strategy targets will not be met.

Other issues and impacts

Public response

- Query what will be the impact if Bournemouth, Christchurch and Poole achieve free port status.
- Lack of vision for further education - to support skill set needed post Covid and Brexit.

16. Policy DEVg: Neighbourhood Plans

Strategic priorities and strategic policies

Town and Parish Councils

- Dorset Council should respect and abide by neighbourhood plans.

Developers/Landowners/Agents

- Agree that Neighbourhood Plans should positively contribute to the local plan vision and strategic priorities and conform with strategic policies.
- The emerging Local Plan should be set up to ensure that Neighbourhood Plans deliver the strategic policies in a positive manner and do not seek to undermine the social, economic and environmental benefits achievable through development.
- Paragraph 2.7.9 states should be qualified to state that more detailed policies within neighbourhood plans cannot be so prescriptive as to hinder the sites allocation and delivery.

Public response

- The Local Plan needs to say more about how the Strategic Priorities can be delivered to help neighbourhood planning groups.

Infrastructure needs

Developers/Landowners/Agents

- Agree that the Neighbourhood Plan should identify the infrastructure needed to support development.

Town and Parish Councils

- Need for a clear indication of when the requirement for improved infrastructure needs is triggered, in relation to housing permitted beyond the DDB, and poor state of village roads.
- It is important to have a clear strategy for supporting the long-term viability of services and the sustainability of the larger settlements in Tier 3.
- The council must provide extra infrastructure to support the extra vehicles these dwellings will generate.

Wessex Water

- Neighbourhood plans should include timescales for infrastructure delivery to ensure it can support development.

Public response

- Infrastructure to support development needs to be better explained.
- Infrastructure needs to be planned concurrently with new development.
- If a Neighbourhood Plan identifies a need for additional infrastructure, will Dorset Council be able to take action?

Deliverability

Developers/Landowners/Agents

- Agree that the Neighbourhood Plan should ensure policies and proposals are deliverable.

Paragraph 2.10.7 - Minimum requirement

Town and Parish Councils

- Concern about the setting of minimum housing requirements of NPs - we know best what suits our village and the level of new build should be contained within a NP

Developers/Landowners/Agents

- The statement in DEV9 that the neighbourhood plan housing requirement figures in Appendix 2 should be viewed as minimum targets that can be exceeded, is welcomed.

Paragraph 2.10.7 - Scope of Neighbourhood Plan

Developers/Landowners/Agents

- The Plan should set out what actions the Council will take to bring sites forward in neighbourhood plan areas that have housing requirements, but where the scope of the plan does not address the allocation of new sites.

West Dorset CPRE

- Insufficient recognition of Neighbourhood Plans which have been produced with great care and much work by local communities.

Paragraph 1.1.2 of Appendix 2 - Sub area targets

Developers/Landowners/Agents

- Support the last sentence of paragraph 1.1.2 of Appendix 2 that: "At no point should these requirements be used as sub-area or settlement targets for the purpose of housing land supply."

Policy DEV9 – Policy wording

Developers/Landowners/Agents

- No objection in principle to wording - suggest the words 'where possible exceeded' at the end of this policy is revised to clarify this is not unfettered and should accord with the principles set out in Draft Policy DEV6.
- To comply with paragraph 65 of the NPPF, neighbourhood plan housing requirements should be set out in a 'strategic policy', rather than in Appendix 2.
- That the Appendix 2 figures are a minimum requirement figures and can be exceeded should be made explicit within the policy wording.
- Suggest revision to the draft policy by amending the term 'where possible exceeded' to accord with the principles set out in Policy DEV6.

Town and Parish Councils

- Some minor amendments to the policy wording have been suggested by Motcombe Parish Council, Milborne St Andrew Parish Council & Holwell Parish Council.
- The policies for neighbourhood planning appear to make adequate provision for Neighbourhood plans to be developed.

Public response

- Policy gives no reason why the housing requirement figure should be exceeded - NPs should be rooted in their communities first.

16.1. Question: Do you have any comments on the approach to establishing housing targets for Neighbourhood Plans?

Support for approach

Developers/Landowners/Agents

- Approach is supported as it provides clarity to Neighbourhood Plan Governing Bodies and to developers as to the minimum amount of housing that needs to be provided in a Neighbourhood Plan area.

Town and Parish Councils

- It is helpful for a housing target to be specified to reduce the time spent on this matter through the Neighbourhood Plan.

Pro-rata windfall rate

Town and Parish Councils

- The housing targets are primarily based on the anticipated levels of housing identified through extant consents, infill opportunities on large sites identified within the settlement boundaries and a pro-rata projection based on a sample of past windfall over the past 7 years.
- These are expressed as a minimum presumably to ensure that the plans do not unintentionally undermine the housing land supply for the Local Plan area, and to clarify that additional growth would be acceptable.
- Whilst in theory this may seem a reasonable approach, the pro-rata windfall rate may potentially cause issues for some areas, if it is unlikely to be sustained.

Developers/Landowners/Agents

- The approach of projecting past housing supply to work out the housing requirement is flawed as there may be some neighbourhood plans (and settlements) that have failed to meet local housing need.

Public response

- As the capacity for windfall decreases a more reasonable method is to extrapolate the trend in the last 3 years.

Windfall rate in Tier 4 villages without settlement boundaries

Town and Parish Councils

- The requirement for Tier 4 villages which don't have a settlement boundary, should not include a windfall element, based on past development rates.

Emerging Strategic Allocations

Town and Parish Councils

- We do not think it is appropriate to include the housing anticipated through the strategic allocation in the Neighbourhood Plan housing targets.
- This is a nominal figure, not specified in the policy (and therefore may vary) and has the potential to cause major problems for a Neighbourhood Plan review should the strategic allocation fail to deliver the amount of housing expected.

- If it were to be included within the housing target, then the Parish Council as the Neighbourhood Plan authority would expect the housing number to also be included in the strategic policy, and for the Parish Council to have a much greater role in masterplanning and testing that the numbers proposed at this stage, to be assured that these are appropriate and deliverable. At the current time, this is clearly not the case.

Developers/Landowners/Agents

- The housing requirement for neighbourhood areas should take into account additional allocations including optional urban extensions.

Housing requirement in Areas of Outstanding Natural Beauty (AONBs)

Dorset AONB Team

- Imposing housing number on NDPs in the manner suggested is not advisable, particularly in the AONBs. There is no reason to consider that a NDP would be able to accommodate this level of growth without considerable effects on the AONB, which would foreseeably run contrary to the recommendations of NPPF 172.
- Using West Lulworth as an example the level of housing would conflict with AONB's management plan and without a principle residency condition would result in a significant number of second homes.

Cranborne Chase and West Wiltshire Downs AONB Team

- The scale of the housing requirements, and the encouragement to exceed them, is seen as inappropriate in this AONB.
- Appendix 2 sets out neighbourhood plan housing requirements and encourages the minimum figures to be exceeded. Adding up those figures for the villages and towns identified that are either within or adjacent to this AONB gives a minimum figure of 3419 dwellings. That total does not include the Tier 3 villages of Cranborne, Sixpenny Handley, and Stourpaine nor Gillingham or Wimborne.
- The imposition of that scale of development on the nationally important landscapes of this AONB, where conserving and enhancing natural beauty are the priority, contradicts the Local Plan's environmental objective.

Housing requirement should be based on detailed assessments

Natural England

- It should not be the role of neighbourhood plans to meet anything other than their own local housing need. If land has not been allocated in the Local Plan, then neighbourhood plans should not be required to go further, unless detailed assessments have been completed to ensure existing and potential biodiversity, public open space, landscape and heritage assets have been fully assessed and protected.
- There is no evidence to suggest such assessments have been completed at this scale and therefore additional housing targets (over that set out in the Local Plan) for neighbourhood plans should not be a requirement of Policy DEV9.
- To include such a requirement runs a real risk that neighbourhood plans will not be able to meet the prescribed housing targets without compromising other local plan policies including sustainability criteria, or substantially harming open areas of value to the local community.

- The character of some rural communities, particularly within the AONBs, may well lie in their very small scale - localities should not have additional housing requirements unless designed to deliver a specified local need.

Housing requirement should be needs based

Developers/Landowners/Agents

- The neighbourhood plan housing requirements in Appendix 2 are not needs based assessments. As they are based on the capacity within settlement boundaries (including windfall on small sites) and existing or proposed allocations, the requirement is effectively set at zero, which is an inappropriate approach.
- There is an underestimation of need where the neighbourhood plan period is shorter than the new Dorset Local Plan period and no Local Plan allocations are being made.
- By setting the NP requirement effectively at zero means that neighbourhood plan groups will either need to commission a housing needs surveys, or the group will not make any housing allocations.
- This approach will result in local housing needs of villages being met through speculative planning applications and goes against the spirit of the government's approach to boost the supply of housing and supporting the rural economy in paragraph 78 of the NPPF.
- Although sustainable Tier 3 villages have been identified, by then setting a housing requirement of effectively zero and making no allocations at the vast majority of villages, the council has failed to 'identify opportunities for villages to grow and thrive'. A strategy which will not address the problem of shrinking household size and an ageing population.

Potential for a settlement to accommodate growth

Developers/Landowners/Agents

- The housing requirements for each neighbourhood plan area in Appendix 2, should not be solely based on housing supply, but should also consider need and the potential for a settlement to accommodate growth, having regard to Paragraph: 101 (Reference ID: 41-101-20190509) of the Planning Practice Guidance.
- This guidance directs local planning authorities to consider other factors such as the characteristics of the neighbourhood area, population and role of settlement's in providing services.

16.2. Appendix 2

Bere Regis

Savills on behalf of the Bere Heath Estate

- Support for establishing targets for NPs. The target for Bere Regis should be increased from 153 to 200.

Blandford +

Bryanston Parish Council

- Blandford+ Neighbourhood Plan will have a critical role in the meeting the areas housing needs, controlling development and supporting delivery of infrastructure.

Chesil Bank

Chesil Bank Parish Council

- 33 new dwellings are proposed for the Chesil Bank Parishes but only Portesham is identified as suitable/sustainable and with a DDB.
- Concerns that building work displaces water in an area already prone to flooding.
- Drainage infrastructure is not capable of dealing with any more surface water.
- The additional houses are unacceptable/unviable and if located in Portesham would increase flooding issues.
- Additional housing will overburden the village school which has limited place and a large proportion of students from outside the area.
- The capacity and infrastructure cannot support development on this scale.

Charmouth

Charmouth Parish Council

- The process for formulating Neighbourhood Plan offers the best chance of establishing a sustainable future for each community.
- The housing allocation proposed for Charmouth (54) needs to be amended to 44.
- An updated indicator of Charmouth's housing requirement has been provided.
- For Charmouth, the figures comprise extant planning permissions plus an estimate of new houses on windfall sites (no specific sites having been identified) and equate to 3 houses pa and, therefore, a minimum housing requirement of 44 over the Plan's timescale.
- This potential level of growth is more achievable considering Charmouth's constraints and reliance on small infill sites.

Cranborne and Edmondsham

Cranborne and Edmondsham Parish Council

- Local self-determination is important, but Cranborne and Edmondsham Parish Council have decided not to prepare a neighbourhood plan - instead it proposes collaborate with the Cranborne Estate/the council.

Fontmell Magna

Fontmell Magna Parish Council

- In Appendix 2, Table A2, why does Iwerne Minster have a requirement for 35 dwellings whereas Fontmell has a requirement for 62. This seems wrong since Iwerne is a much larger village than Fontmell?

Gillingham

Gillingham Town Council

- Please supply a breakdown of the Gillingham figure shown in Appendix 2.

Vistry Group Limited and Hallam Land Limited

- The housing requirement for neighbourhood areas should take into account additional allocations including optional urban extensions.

Public response

- Reduce figure for Gillingham by 70 for Common Mead Lane (and 20 for Barnaby Mead).

Hazelbury Bryan

Hazelbury Bryan Parish Council

- The figures within that 7 year period are likely to have been influenced by the take-up of barn conversions through Class Q permitted development rights (an element of new growth that might not be sustained) and the consequences of decisions having been made on the basis of the lack of a 5 year housing land supply.
- However, the scale of growth proposed for Hazelbury Bryan (78 homes) is likely to be exceeded through the extant consents and Neighbourhood Plan proposals, including in-fill and exception site development, so the minimum target should not be an issue for our parish. It would be helpful to see the analysis and assumptions used to calculate our increase to 78 dwellings.

Loders

Loders Parish Council

- Concern with the Neighbourhood Plan housing provision figures in Appendix 2 – an explanation is required of how the figure of 11 is calculated.
- Neighbourhood Plans should also play their part and Dorset Council should clarify and specifically support their role through guidance and incentives.

Leigh

Leigh Parish Council

- The draft Appendix 2 requires Leigh to deliver 19 new dwellings over the 17 year period of the plan. For Leigh, this figure is made up of 5 extent planning permissions and a windfall allowance on minor sites of 14.
- The windfall allowance has been calculated on the basis of a past completion rate of 6 dwellings over the last six years. This approach leads to imbalances, which do not reflect the settlement hierarchy.
- Leigh Parish Council consider the neighbourhood plan housing requirement for Leigh should be based on the approach to development in Tier 4 villages, as set out in paragraphs 2.6.20 and 21 of Section 2. The requirement for Tier 4 villages which don't have a settlement boundary, including Leigh, should not include a windfall element, based on past development rates.

Lytchett Matravers

Public response

- 120 houses been built in the village since 2012 but not included when calculating additional housing need.

Marnhull

Marnhull Neighbourhood Plan group, Ros Eveleigh

- Unsure about the purpose of the housing requirement figures set out in Appendix 2?
- Numbers of houses are listed against each village, but the caveats make it clear that these numbers cannot be used. How can villages make plans without having an agreed housing need?

If the figures in Appendix 2 cannot be used, what is the point in providing them? In short, how can villages agree plans without having an idea housing need?

Savills on behalf of P and D Crocker

- Suggestion that there are no obligations on Neighbourhood Plans to provide allocations for future housing growth at Marnhull, as the housing requirement in Appendix 2 has already been met through sources indicated in Para 1.1.1.

Maiden Newton and Frome Vauchurch

Maiden Newton Parish Council

- Maiden Newton and Frome Vauchurch will not be completing the NP in timeframes set out in DCLP as they are awaiting results of census 2021 and may form a group council.

Frome Vauchurch Parish Meeting

- Work on the Maiden Newton and Frome Vauchurch Neighbourhood Plan is on hold until the 2021 census results are available, and the Community Governance review has been carried out.

Motcombe

Motcombe Parish Council

- Issue with figure for Motcombe – it says 129 but should be 63 – does not show how figures are derived.

Milborne St Andrew

Milborne St Andrew Parish Council

- Milborne St Andrew has produced a neighbourhood plan that caters for a reasonable level of growth, and once this is built, we would expect to look at identifying further sites. Whilst not wanting to become a town, the village has been evolving and growing for many years and the facilities such as our school, pub, shop, sports ground etc. need to be supported.
- The Neighbourhood Plan housing numbers, as specified in Appendix 2, are (as stated in 2.10.6) simply based on the strategic allocations (where such are proposed) plus projected growth from SHLAA sites and windfall.
- Whilst this enables communities to decide whether or not they wish to enable further growth, it fails to plan positively for these areas in terms of any real consideration of their needs and their capacity to undertake a Neighbourhood Plan.
- The scale of growth proposed for Milborne St Andrew (80 homes) is likely to be exceeded through the extant consents and Neighbourhood Plan proposals, so the minimum target is not an issue for our parish.

Alder King on behalf of Wessex Strategic

- If the existing neighbourhood plan is to be updated, the housing requirement for the village is set out in appendix 2 and states that 80 homes will be required in the village over the plan period.
- Site at Homefield, Milborne St Andrew will mean that the whole 80 dwellings and more could be provided in one.

Savills on behalf of Wyatt Homes

- Appendix 2 of the DLP shows Milborne St Andrew as having a ‘housing requirement’ of 80 homes for the whole plan period, to 2038. This figure is calculated as the sum of those elements identified at 2.10.5.
- Whilst the figure of 80 homes is to be treated as a minimum, Para 2.10.9 highlights that “There is no requirement for neighbourhood plans to allocate sites or identify any additional land to meet the overall Local Plan housing need figure.”
- Given Tier Three Settlements have been identified as being more sustainable locations, we would question whether it is appropriate for the Plan to remove any requirement for these settlements to help meet the overall Local Plan housing need figure by identifying additional land for development.

Milton Abbas

Milton Abbas Parish Council

- The assessment process for identifying developable housing sites does not have regard to the recent Neighbourhood Plan (NP) which conducted its own assessment of sites suitable for development. The two sites included in Appendix 3 were not selected for development in the neighbourhood plan and one of the sites was rated as the least suitable for development.
- LA/MILT/001: Deer Park was included in the NP but to a reduced extent and it was excluded from the preferred list in part, because of its prominent position in the AONB and the visual impact of any development on the site.
- LA/MILT/005: Land to the west of Athelstan Way was the least preferred site in the public consultation. This site is also in the Milton Abbas Conservation Area as well as the AONB. The stated density for the site is excessive and would be in breach of the policy established in the NP.

Pimperne

Pimperne Parish Council

- For Pimperne, we have been given a target of 276. The Planning Policy Team have confirmed that this has been calculated based on: 200 homes being delivered within the parish as part of the Policy BLAN7 (to which we are objecting), the 45 homes allocated through our Neighbourhood Plan policies (HSA1 – 3), and a further 31 homes, of which 10 have planning consent, and 21 are expected to be ‘windfall’.
- If the Council wish to take the stance that BLAN7 is a strategic policy and as such is not a matter that can be varied through the Neighbourhood Plan, then it would be better to express the housing target as excluding this strategic allocation.
- For Pimperne, within that six year period, the redevelopment of the primary school site took place (following the school’s relocation) and provided land for 5 of the dwellings (accounting for more than 50% of the windfall).
- The question then is whether similar opportunities such as this larger site are likely to be repeated at least twice within the remaining plan period (as the pro rate element is based on 14 years)?
- Whilst one such example has already arisen with the redevelopment of the village shop (without its replacement), this is already included in the extant consents, and it is considered highly unlikely that there will be more such examples.

Pimperne Neighbourhood Plan Group

- Pimperne Neighbourhood Plan Group agrees with the responses submitted by Pimperne Parish Council (11th March 2021) and the Cranborne Chase AONB (10th March 2021) relating to the draft Dorset Council Local Plan.

North Dorset CPRE

- The requirement figure includes 200 dwellings allocated in Policy BLAN7 and in addition to 45 dwellings in the Pimperne Neighbourhood Plan, plus 10 houses given permission and 21 houses referred to as a small site windfall allowance.

Barton Wilmore on behalf of Wyatt Homes and The West Pimperne Pool Trust

- One of the criterion for calculating the targets is the capacity of major sites within development boundaries.
- We would like to draw the Council's attention to the boundaries of site BLAN7 which cover two neighbourhood plan areas.
- It is important that new homes are located in sustainable locations, close to where demand arises, in order to minimise the need to travel, support economic growth and maintain social relationships.

Public response

- Section 2 of the plan sets out the allocation of houses to the larger villages and does not include Pimperne. But in Appendix 2: Neighbourhood plan housing requirement it identifies some 276 houses for the Pimperne NP.

Portland

Portland Town Council

- Portland Neighbourhood Plan growth and development papers listed a number of potential sites, this has not been recognised. It would be helpful if the Plan supported this to provide more clarity around a spatial approach.
- Appendix 2 indicates 1050 houses to be built but where?
- We agree with the intention to focus within development boundaries and brownfield sites, but an assessment of the potential yield is needed.
- We have serious concerns regarding housing supply and the specific location of sites.
- Portland has been building a maximum of 50 dwellings per year for 20 years.
- Without knowing the specific sites intended for development, it is difficult to see how 1050 dwellings could be achieved?

Wimborne St Giles

Bloombridge LLP on behalf of Shaftesbury Estate

- Object to Wimborne St Giles not being included in Appendix 2 - suggest 20 dwellings.
- DEV9 should say that the approach to Affordable Housing for each neighbourhood plan will be decided at the local level.
- Attached is a summary of the community engagement exercise undertaken in 2016 by the Shaftesbury Estate regarding Wimborne St Giles.
- Support DEV9 however would appreciate dialogue on resolving wider vision for Wimborne St Giles beyond the proposed neighbourhood plan boundaries.
- Wimborne St Giles should be added to Table A2 in Appendix 2.

- Support but would like a dialogue with Dorset Council on how to resolve the wider vision for the Shaftesbury Estate.

Stinsford

North Dorchester Consortium

- It needs to be shown how the neighbourhood plan housing requirement for Stinsford of 2,348 new homes (set out in Appendix 2), has been calculated?
- It would be helpful to increase the housing requirement to 3,500 dwellings to reflect what is proposed at North Dorchester under Policy DOR13 (which is largely within the parish), in order to avoid any conformity issues between the strategic policies of the Local Plan and the emerging neighbourhood plan.

Public response

- The housing figure for Stinsford is disproportionate to a small rural parish.

Thornhackett

Thornhackett Parish Council

- The policies for neighbourhood planning appear to make adequate provision for Neighbourhood plans to be developed. Whether such a neighbourhood plan would be suitable for Thornhackett PC has not been determined.

Wareham

Wareham Neighbourhood Plan

- Supports housing requirement for Wareham NP.

Wareham Town Council

- Support the proposed housing requirement for Wareham Neighbourhood Plan area.

Public response

- Given the role that Wareham plays in the South Eastern Dorset Region it is not appropriate to delegate meeting housing needs to the Neighbourhood Plan.

West Lulworth

Public response

- In relation to Appendix 2 - allocation of 52 houses for West Lulworth, was the figure before the Purbeck Local Plan Modification figure of 12 houses was taken into account - revised figure of 24 homes should be included.

Weymouth

Weymouth Neighbourhood Plan Group, Cllr David Northam

- NP housing figure for Weymouth is questionable - concern there is double or triple counting of sites and windfall allowance is too high.

Public response

- Concern with figures for Weymouth - figures need rechecking as I believe there is double accounting between WEY2 sites with planning permission and the small sites listed within Appendix 3.

Yetminster & Ryme Intrinseca

Yetminster & Ryme Intrinseca Parish Council, Cllr Geoffrey Goater

- Yetminster is tabled needing 152 new housing units, despite the fact that a recent application for 95 houses was approved, increasing the population by some 20 – 25% with no mitigating planned infrastructure improvements.
- Concern with impacts of proposed additional housing in Yetminster - against the express wishes of the residents who opted for steady organic growth over the lifetime of this Plan.

Sherborne and District Society CPRE

- Large allocation for Yetminster of 40% increase in population - would ruin nature of the village and community.

Missing Neighbourhood Plans

Developers/Landowners/Agents

- Lack of NP at Burton Bradstock and Sixpenny Handley. These settlements are identified in the Council's hierarchy as a sustainable tier 3 settlements but have no prospect of providing housing to meet even local needs under the current policy proposals.

Leigh Parish Council

- Other Tier 3 villages nearby, such as Thornford, Hazelbury Bryan and Bradford Abbas do not have any stated housing requirement in Appendix 2.

Shaftesbury Estate

- Wimborne St Giles should be added to Table A2 in Appendix 2.

16.3. Neighbourhood Plan process

Neighbourhood Planning process

Town and Parish Councils

- Concern that the lack of 5 Year Housing Land Supply will continue to be problematic for neighbourhood plans.
- Need to indicate clearly when and how Neighbourhood Plans should be updated?
- There is a lack of clarity on when the timeframe to meet Neighbourhood Plan housing provision commences. Is it when the Neighbourhood Plan came into force or the Dorset Local Plan?
- Concern that NPs are not taken seriously by planning applicants and Dorset Council.
- As NPs are time consuming, can plans in development be considered in planning decisions?
- Dorset Council should consider ways it can support communities with producing neighbourhood plans.
- Neighbourhood Plans are relevant to the Local Area, especially with regard to Affordable Housing.

- Neighbourhood Plans, which consider housing and employment site allocations together should have been referenced in the DC Plan.
- Concern with reliance of figures from Neighbourhood Plans disadvantaging local areas who have not completed such a plan.
- The establishment of Neighbourhood Plans and DDB's should be more strongly encouraged by the County.
- The process should be simplified/streamlined to make them easier to put in place.
- What is the approach to defining housing numbers in neighbourhood plans?
- NPs should be encouraged with support from Council officers - but plans should not have to conform to Appendix 2 housing figures.
- It is understood that the Local Plan will decide housing numbers in parishes but it is most important that planners look at the sites proposed by the Plans and be sympathetic to the needs of local communities.
- If there are strong enough reasons to reduce the housing numbers and to look elsewhere for the housing, planners must consider this option.
- Dorset Council has not got the authority to impose housing targets on Neighbourhood Plans. Dorset Council can advise but cannot decide for that for parishes.
- It is not reasonable nor realistic to expect a parish council or community group to undertake a review and update of their neighbourhood plan (which usually covers 15 years) after only two years of currency.

Historic England

- Allocations in neighbourhood plans should be informed by heritage impact assessments.

Natural England

- Section should be expanded to include requirements for new green infrastructure that meets community needs.
- The local plan should encourage neighbourhood plans to seek to wholly, or partly, meet nutrient offsetting and or biodiversity net gain requirements through the allocation of land for permanent land use change to suitable community uses (e.g. community orchards and woodlands, local nature reserves, etc.)

Sport England

- It should be made clear that housing delivery should not override other NPPF paragraphs such as 97 - the protection of playing fields.

Campaign Groups

- Dorset Council should revise its programme for progressing the Local Plan in order to provide a further opportunity for communities to express clearly what level of growth and supporting infrastructure could be beneficial to those communities and the extent to which they may wish to take a lead identifying sites to meet any such needs through Neighbourhood Plans.
- Concerns over accuracy of NP section - villages named who have no adopted plan.
- Insufficient recognition of Neighbourhood Plans which have been produced with great care and much work by local communities.
- Opportunity to ensure that local knowledge, understanding is harnessed onto the eventual formation for a sound Local Plan.

Climate change groups

- The housing targets do not seem to relate to local needs but to figures derived from central government.
- Para 60 of the NPPF allows planning authorities to use a different method of calculating housing growth and the council should calculate the actual housing needs of the county.
- Welcome the status of Neighbourhood Plans, and their development boundaries.
- Concern with recent examples of development outside DDBs.
- Importance of the Localism agenda and involvement of local people in future planning for their areas.

Developers/Landowners/Agents

- Supports the use of neighbourhood plans provided that they are used to positively direct new development - rather than placing further financial burden on development.
- Allocation of housing land should be supported but development outside of any allocation should not as a result be deemed unsuitable in planning policy terms.
- The minimum requirements that are identified for the Tier Three settlements only account for those that have a Neighbourhood Plan.

Public response

- Concerned that neighbourhood plans do appear to be given appropriate weight when taking decisions on planning applications.
- Housing targets for neighbourhood plans should be established by local residents.
- Suggestion that that a Neighbourhood Plan does not necessary get trumped by a Local Plan when there is conflict between the two Plans.
- Neighbourhood Plans should be the basis of development rather than regarded as subordinate to the Local Plan.
- Neighbourhood Plans should be used to help decide suitable numbers and locations for new homes.
- Importance of involvement of local people in visioning and shaping the future of their settlements and local assets.
- Neighbourhood plans have to have community referendum so are probably the closest to a democratic method of community planning.
- Neighbourhood Plans should consider design matters.