



# Dorset Council **Local Plan**



## **Housing**

2021 Consultation  
Summary of Responses

January 2023



**Dorset**  
Council

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## 1. Housing

### 1.1. Introduction

#### Paragraph 4.1.1

##### Bridport Town Council

- BTC challenges the view that the only pathway out of the housing affordability crisis is to build more market housing.
- BTC agrees with Dorset CPRE on the need to re think the approach to housing in the Local Plan – a shift to one based on delivering local housing need not national housing want.
- In the Western Functional Area housing need is largely for social rent housing – BANP HNA.
- BTC’s preferred model is to deliver the affordable housing through a variety of mechanisms. This might include through Housing Associations, Council Housing and community led initiatives, CLTs, Co – housing and self-build.

##### Public response

- The present policy of allowing private developers to dominate the housing provision is not bringing the results we need especially affordable environmentally sound and affordable rented.
- Why is impact on the highway network mentioned for employment but not for housing?

#### Paragraph 4.1.3 - Strategic Priorities

##### Town and Parish Councils

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

##### Dorset Climate Action Network

- Suggestion of third strategic priority– “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”.

##### Public response

- Strategic aims presented in the table are to be commended.

#### Paragraph 4.1.4 - Modular Housing

##### Town and Parish Councils

- Paragraph 4.1.4 - Should mention modern methods of construction as well as Modular and traditional.

##### Developers/Landowners/Agents

- Paragraph 4.1.4 fails to set a positive agenda to encourage MMC housing, which is likely to be critical to the delivery of future housing in Dorset. The paragraph should be deleted and replaced with a positive policy and text to encourage MMC housing.

## Public response

- Paragraph 4.1.4 - “modular homes” is open to interpretation – suggest instead: “homes of non-conventional construction, such as modular or factory-built”.

## 2. Policy HOUS1: Housing Mix

### 2.1. Approach

#### Paragraphs 4.2.1 - 4.2.2 - Providing a mix of housing types and sizes

##### Town and Parish Councils

- Lack of smaller open market properties in villages is a key issue.
- The adopted LPs fail to secure the delivery of most needed house types, with delivery generally focusing on larger (and presumably more profitable) traditional house types.
- Need to take into account local need when considering housing mixes.
- Housing mix needs to vary according to area.
- LP should clarify how DC will engage with parish councils around developing suitable housing.
- To be effective, need readily accessible data on current housing mix within each community and recommendations on type of housing needed to achieve an appropriate balance. Is it possible for Dorset Council to produce supplementary guidance and consult on this?

##### Community Groups (non-statutory)

- Be clearer on what exactly housing need is.

##### Developers/Landowners/Agents

- Plan fails to fully consider the needs of different housing groups and is therefore contrary to the NPPF (Para 59-61) – should make provision for those who want to self/custom-build, in the Self-build and Custom Housebuilding Act 2015. The duty is on the LPA to bring forward sufficient permissioned plots to meet the demand of the register.
- Further clarification required on proportion of homes that should be provided as park homes/mobile homes to support independent living.

##### Public response

- The development of detached houses should be banned, we need affordable houses only.
- This is an important section given the changing demographic – We should be moving away from vast estates of detached housing to more specific housing needs.
- Any residential development should include properties suitable for "First Time Buyers" and "Retirees " in the private sector.
- Houses for those with limited mobility must not be built at a distance from the town amenities.
- Sheltered housing is needed and should be factored into new build opportunities.
- Welcomes flexible approach to housing mix according to settlement.
- New development should include a substantial proportion of one or two bedroomed homes which are likely to be more affordable.
- Include more smaller open market houses such as 1 or 2 bed and 1 bed affordable homes to accommodate smaller families, couples and single people, as well as homes for families and to encourage people to downsize. Perception that there are enough 4 and 5 bedroom homes.

- There should be specific local requirements to secure types/tenures of homes needed by local communities.
- Council should seek to support delivery of good quality high intensity housing to encourage people to 'downsize' and free up other existing housing stock.
- A good community needs mixed housing.
- Use Bridport Area Housing Needs Assessment document as a template for the whole of Dorset.

### Paragraph 4.2.3 - Housing needs for the elderly

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#### Town and Parish Councils

- There should be smaller and more affordable homes for the elderly.

#### Community Groups (non-statutory)

- Need to enable older people to move into smaller dwellings suited to their needs and near to the services on which they depend.
- Suggestion that there is a demonstrated need for specialist housing for older people in the wider Dorset area, and the former East Dorset area, as a result of an ageing population.

#### Developers/Landowners/Agents

- Whilst it is acknowledged that some people may wish to remain in their own home, or adapt their own homes, there is clearly a need to provide specialist accommodation for older people.
- Need to consider various forms of accommodation in the retirement sector - retirement housing, extra care and retirement communities, and care homes.

#### Public response

- There should be homes designed specifically for elderly and infirm.
- Dorset is going to need a lot of accommodation suitable for elderly people in singles and couples, many of whom will be choosing (or being obliged) not to drive anymore.
- All new homes should be designed with the flexibility to accommodate people when they get older - not just a percentage.
- High population of elderly in Bridport so this would be a good idea but maybe unambitious.
- Use 2021 census to help identify areas of high percentages of elderly and consider these areas to need a higher than 20% allocation of accessible and adaptable homes.

### Paragraphs 4.2.4 - 4.2.5 - Accessible and adaptable dwellings

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#### Town and Parish Councils

- There is a need for flexible and accessible housing provision to enable people to live in homes longer.
- Potential need / benefit of flexible accommodation to enable live-in care / annex options as part of any housing mix.

#### Community Groups (non-statutory)

- Wish to see younger families enabled to find dwellings which can be adapted or extended as the children grow or as the families' working regimes change.

#### Developers/Landowners/Agents

- Providing house types which are accessible and adaptable is a national requirement through Building Regulations M4(2) - do not consider this needs to be repeated in local plan policies, as

this requirement is already captured nationally – it would result in the policy becoming out of date quickly, should national requirements change, which is highly probable with the emerging Future Homes Standard proposed by Government.

- The provision of Extra Care units will contribute to the delivery of accessible and adaptable dwellings both on major residential development sites and through specific site allocations.

### Public response

- All new homes / adaptations should be built to accept wheelchairs, with wider doors, corridors and stairs.
- All homes should be accessible and adaptable as disability is not restricted to the elderly.
- To build homes that are suitable only for the fit and well is discriminatory.
- With one of the oldest populations in the country, Dorset should be taking the lead when it comes to providing adaptable homes fit for both young and older people.
- The percentage of accessible homes depends on the type of housing. The percentage should be higher for bungalows and flats.
- Accessible housing requirements should be in building regulations.
- Growing need (as the population ages) for homes which can be used by older people and people with disabilities.
- Not clear that the proportion of accessible/adaptable homes are needed.
- Not possible to limit/restrict occupation of accessible/adaptable homes to those in need.
- Requirement should be flexible and that funds could be provided to make existing stock more accessible/adaptable.
- No need to apply the requirement for 20% of new homes to be accessible/adaptable in Sherborne because two new retirement homes have recently been built in the town.
- There is a need for accessible and adaptable homes for the elderly, but unsure whether there is also a need for those people who are not mobile.
- Agree with accessible and adaptable housing; locate next to public transport and town centre - or encourage higher proportion in these areas.
- Adaptable and accessible homes should be for local residents.
- Should meet M4(3).
- Support for M4(2) on all tenures.
- Developers will charge too much for them; make funds available to adapt housing instead.

## Home working and live/work units

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### Community Groups (non-statutory)

- Live / work units work well in a town but not in small villages, unless they are considered as a courtyard development with garden areas. They can create isolation unless the design is thought out with a community in mind, particularly in rural areas.

### Public response

- The impact of the pandemic demonstrates a shift in ways of working, especially home working. This might affect the design requirements for homes in terms of space, and location.
- Include 'live/work' dwellings to allow a reduction in carbon emissions from commuting and enable home working.

## Alternative approaches

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### Public response

- Fund good quality care in the community as an alternative.

## 2.2. Policy

### Policy approach

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#### Town and Parish Councils

- No evidence is presented for proposed proportions of housing type and tenure.
- How can such policies be applied in small communities where most new housing development is for single or small numbers of properties?
- Concern that the policy might allow developers to avoid the requirements by suggesting that the mix of homes is achieved over multiple sites.
- The policy should be worded to specifically prohibit the development of sites for the same purpose until the local housing mix has been re-balanced - either within the core policy or recognising the right of Neighbourhood Plans to prohibit a specific form of development.
- No objection to the introduction of these standards providing that the policy is compliant with provisions set out in the PPG (Paragraph: 007 Reference ID: 56-007-20150327).

#### Community Groups (non-statutory)

- Agree with approach - There is a need for sufficient accessible housing provision to enable people to live in homes longer.
- Purposes related to housing mix may also be pursued by changes to existing buildings.

#### Dorset County Hospital, NHS trust:

- Support the objective of the policy but object to the wording.
- DCH masterplan includes housing for hospital staff – this policy should be revised to allow for a specific exemption at DCH.

#### Developers/Landowners/Agents

- Requirements need to be subject to viability evidence at plan-wide level.
- Support for the flexibility set out in the policy - will enable developers to respond to market demand rather than be constrained by a restrictive policy, thus enabling developments to respond to the existing settlement and its needs, which is likely to change over the life of the Plan.
- Policy requirement as drafted is unlikely to meet the examination requirements unless substantiated by sufficient evidence in the next iteration of the Local Plan.
- Concern that the plan conflates the needs of older people and less mobile people. These different needs should not be grouped within a 'catch all' policy like this one.
- Support the proposed approach to housing mix (which provides flexibility for change over the plan to reflect any changes in circumstance) and the requirements/costs arising from providing accessible/adaptable homes should be taken into account in development viability.

### Public response

- Agree, if built on brownfield sites.
- Disagree – because there is not the infrastructure to support older people in Corfe Mullen.



- Agree - unlikely in Corfe Mullen due to high prices and lack of incentive for developers - never held to initial agreed targets.
- If taken into account during the design of a new home, rather than being treated as an add-on afterwards, the cost impact of these provisions is relatively small.
- Agree if the approach can be adhered to - concern with previous instances of developers reducing the provision of such desirable elements.
- Policy fails to secure the delivery of smaller open market properties which is a key issue in many villages.
- Support providing this accommodation will free up availability in existing housing stock.
- Too prescriptive – should be based on site topography - adjust wording to include 'and where topography the unit mix allows'.
- May not be appropriate or achievable on smaller sites.

## Criterion I.

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### Town and Parish Councils

- The Housing Mix policy should recognise that there are locations, often in towns, where there has been disproportionate provision of accommodation solely for one group, e.g. for retirement.
- Lack information to define what “an appropriate mix of homes of different sizes, types and affordability” means - Suggestion of covering these issues in SPD.
- Agree with the general principle that development should seek to achieve sustainable and balanced communities – but recommend the inclusion of an additional statement that new development should be properly integrated into the existing community.

### Community Groups (non-statutory)

- Support for the policy in relation to achieving sustainable and balanced communities through an appropriate mix of homes of different sizes, types and affordability – but schemes focussed only on affordable housing may be partly exempt from that principle.

### Developers/Landowners/Agents

- Reference to “an appropriate mix of homes” in Policy HOUS1 (i) is unclear and needs to be defined how this will be assessed when proposals are considered, to provide certainty.

### Public response

- Support but first criterion should make reference to meeting local need.
- The size of homes on allocations should reflect local needs rather than the market.

## Criterion II.

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### Town and Parish Councils

- 20% is a realistic percentage - developers should not be allowed to deviate from this.
- 20% seems high. Neighbourhood plan would be a better indicator of the local requirement. A major residential development should consult the local Public Health Officer to establish the needs of the less able in the neighbourhood rather than adopt an arbitrary figure.
- Delete “unless robust justification is provided to explain why this cannot be achieved on site”.
- 20% requirement is too high. The wording should be changed to “up to 20%” otherwise there will be too many houses for this specific need at the cost of others. Some areas do not have large numbers of ageing or disabled population.

### Community Groups (non-statutory)

- 20% seems too low.

### Developers/Landowners/Agents

- Support for phrase - “unless robust justification is provided to explain why this cannot be achieved on site”.
- Agreement with approach to accessible homes.
- Requirement of at least 20% of all dwellings on major sites as Accessible and Adaptable could have significant implications in terms of both land grab and viability and therefore needs to be viability tested.
- 20% target will have implications with regards to the efficiency of a developments layout and certainly its viability – also contrary to Purbeck LP which requires a more realistically achievable 10% requirement (Policy H10).
- It is not clear what would constitute ‘robust justification’ which could place potentially onerous requirements on developers to demonstrate that this cannot be achieved.
- In relation criterion 2 - important that these and other such requirements are factored into the whole plan viability assessment - produced in liaison with landowners and developers, and published for comment prior to Regulation 19 consultation stages.
- Agree with the policy in theory - suggested wording in relation to criterion II - 'On major residential development sites, at least 20% of all dwellings across all tenures should be provided at the Accessible and Adaptable Dwellings as established through building regulations (M4(2) standard, unless robust justification including evidence of lack of need or development viability is provided to explain why this cannot be achieved on site.'
- Percentage requirement should be removed and the requirement should reflect local, evidenced need – amend HOUS1(II) to “New development will meet the relevant national standards and requirements to be adaptable to the future needs of occupiers over their lifetime.”.
- Unclear how 20% requirement has been determined and what evidence base the Policy uses to ensure this will meet requirements for older people.
- The application of this policy requirement would lead to an increase in floor area, which adds cost without necessarily adding to the overall sales value.
- 'At least' is contrary to PPG viability and plan making paragraph 001, should be a specific percentage.
- The requirement for 20% of new homes to meet M4(2) standards could be unnecessary in the event of changes to Part M of Building Regulations (which have been subject to separate consultation) - the council's decision to adopt option standards in respect to adaptable and accessible homes should be fully justified.
- Given the demographic, and increase in elderly population, is this too low? Moreover, would this not be achieved via building regulations as stated? This would also rely on the constraints of the site, i.e., where sites are built on sloping areas where accessibility would be a challenge this would need to be considered.

### Public response

- Local needs must be re-assessed and figures adjusted accordingly - a proportion greater than 20% may be required.
- Agree that major residential development sites should contain a mix of homes, but whether 20% is the right number is impossible to judge given the lack of evidence.

- Setting a target of 20% constructed as “Accessible and Adaptable” is not enough - means that 80% of new housing stock will be unsuitable in years to come for ageing residents.
- Whether 20% is right for a particular development should be decided based on the specific circumstances of the area and housing need there.
- Accessible homes are essential but how many should not be an arbitrary percentage.
- Agree with the proportion of accessible and adaptable homes required by the policy, but consider that 'easily adaptable homes' are provided and consider that there should be limits on the proportions of larger (4/5 bed) homes delivered.
- 20% is too low a figure. The minimum should be 50% with the aim of achieving 100% as the minimum standard should be achievable for all new builds.
- Supports 40% to enable a greater choice of accommodation for the elderly and less mobile.
- Others supported 33% to 100% of homes being adaptable and accessible dwellings.
- 10% is adequate.
- No evidence to suggest 20% is necessary as not that many people will have a mobility problem.

### Criterion III.

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#### Developers/Landowners/Agents

- Inappropriate to ask neighbourhood plans to identify local needs and for development proposals to look to meet this need.

#### Public response

- HOUS1 (iii), the influence of a neighbourhood plan should be stronger than “...looking to meet the need” - statement should be worded “...development proposals should comply with these requirements”.

### Additional criteria

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#### Developers/Landowners/Agents

- Suggest adding a viability test to the policy criteria.

## 3. Policy HOUS2: Affordable Housing (AH)

### 3.1. Approach

#### Paragraphs 4.3.5 - 4.3.6 - Affordable housing threshold

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##### Town and Parish Councils

- Desperate need for AH – all sites more than 2 dwellings should provide at least 1 AH.
- Colehill should be a designated rural area so that AH can be sought on smaller sites (5+).
- Not sure if Portland is categorised as urban or rural – should be considered separate to Weymouth.

##### Cranborne Chase AONB

- Paragraph 4.3.5 - welcome the commitment to require AH as set out here.

## Homes England

- Suggest that designated rural areas shown in Figure 4.1 are listed in the supporting text and/or appropriate reference within future online policy maps.

## South West Housing Association Planning Consortium

- Support the lower AH threshold in designated rural areas as a mechanism to boost supply of AH.
- Welcome the recognition that there may be special circumstances that warrant the removal of staircasing restrictions – given the extent of the designated rural areas in Dorset. This should be on a case-by-case basis.

## Developers/Landowners/Agents

- Policy should be amended to allow alignment with any higher thresholds set nationally.

## Public response

- Support for threshold of 5 new dwellings as the trigger for mandatory provision of AH.
- The lower limit for affordable housing should be 4 rather than 5.
- Fig. 4.1 does not include Lydlinch parish in the designated rural areas.
- Fig. 4.1 - map is of little use because one cannot identify specific places or areas.
- A plan should be produced that serves local people and supports those who can't afford to buy a property.

## **Paragraphs 4.3.7 - 4.3.8, and Figure 4.2 - Proportions of affordable housing**

### Town and Parish Councils

- Agree with AH at different rates across Dorset – to take into account market prices.
- Would like to be able to nominate local people for affordable homes.
- Modest need for homes in Bradpole - of the homes provided, 50% should be 'affordable'.
- Queries the boundaries and implications for the zones.
- The policy should increase proportion of affordable homes delivered on sites.
- The requirement for 35% AH is excessive - delivering this number of AHs with new development would create imbalance with existing market homes.
- The proportion of AHs should be determined at the planning application stage and AHs should be fully integrated with development (both in terms of their positioning and design).
- All zones should be 40%.
- Minimum requirement of 35% AH in the Bridport area (reflects NP Policy H1).
- Burton Bradstock should be in Zone 1 for 35-45% AH in new developments (of 5+ homes).
- Developments should provide at least 40% AH (at Colehill).
- Minimum of 25% and should be agreed locally.
- 25% AH at Portland is not adequate to deal with housing waiting list – 40% more appropriate.

### Historic England

- Paragraph 4.3.8 – re vacant building credit - we would welcome specific mention of heritage at risk here as flexibility with policy requirements and standards can sometimes assist in finding long-term solutions for these heritage assets.

### Network Rail

- The AH requirement is lower in locations served by rail (Zone 3 Gillingham, Crossways, Wool, Weymouth, Portland), whereas it might be more appropriate to have a higher proportion at these locations given that people living in AH may be more reliant on public transport.

### Community Groups

- Providing truly affordable housing is difficult.
- Expectation of minimum of 35% affordable provision in line with BANP.
- Significant need for “Social” rented housing.
- AH should be delivered at the higher 40% rate across Dorset.
- Need to insist upon larger AH quotas in all housing development.

### Homes England

- Conditional support for 3 AH zones as proposed, providing they are clearly defined and assessed, including viability considerations, using up-to-date evidence.

### Cranborne Chase AONB

- The proportions set out in Policy HOUS2(II) differ from the ranges set out in Figure 4.2.

### Home Builders Federation

- There may be justification for variations in the proportions of AHs sought from development in reflection of variations in land value.

### South West Housing Association Planning Consortium

- Pleased that ambitious AH thresholds are being proposed – this will help boost the supply of AH.

### Green Party Group of Dorset Councillors

- The Council should be bolder and ask for 60% in zone 1, 50% in zone 2 and 40% in zone 3.
- If insufficient private investment comes forward, the Council should borrow to do so itself.

### Developers/Landowners/Agents

- The proportion of AH fails to appreciate the impacts - it will reduce the quantum of growth in those areas with the greatest affordability issues rather than delivering a higher rate of AH. Preferable to increase the supply of housing across Dorset – with AH no greater than 30%.
- No viability evidence presented with the draft local plan.
- Review the proportion of AH to be more confident around viability and to maintain supply.
- Percentage of AH should be no more than 30% - this will encourage delivery, both in those areas where viability could be undermined and with the highest profitability.
- Figure 4.2 footnote 5 is noted – the precise split should be confirmed as soon as practically possible.
- Table needs an accompanying plan/map to clearly show the extent of the zones.
- Regarding AH requirements - strategic sites are often a unique form of development with different infrastructure requirements, viability and AH thresholds.
- Agree that AH should be delivered at different rates across Dorset.
- Crossways / Moreton Station should be in Zone 3 (25% AH) due to existing AH supply in the area and viability factors.
- The requirement to provide a range of 30% to 40% (Figure 4.2), and 35% affordable housing within Zone 2 (HOUS2: Affordable Housing Criterion II) is welcomed.

- A varied AH requirement across Dorset is supported as values vary hugely across the area.
- Support but this will need to be monitored as values in areas may change over the plan period.
- AH requirements should be clear so that they can be accurately accounted for in the price paid for land. A range (e.g. 30-40%) introduces uncertainty and risk in the viability assessment and in the DM process.

### Public response

- A generous AH quota must be fixed or the policy will fail lots of less affluent residents.
- Paragraph 4.3.8 - it is wrong and illogical that developers should be “let off” building AHs because they have demolished or converted a disused industrial building.
- Disagree with approach - Rates of provision should be assessed according to local needs and that which is expected to be required in the future.
- Agree that AH should be delivered by developments at different rates across Dorset.
- Should seek 30-40% affordable housing.
- Percentage of AH should be higher - 20% will not meet current and future demand and needs to be 30% to 40% - developers and builders will need to be incentivised or compelled to comply with higher targets, possibly by financial partnership with Dorset Council in shared equity, e.g social housing build.
- Amount of AH should be geared to the needs of the area rather than an arbitrary national need figure.
- Fig. 4.2: the range of ‘affordable housing requirement’ given here of 30% to 40% is well in excess of that achieved in recent developments. Social, as well as ‘affordable’ housing should be a priority area in any Local Plan, because that’s what Dorset needs.
- AH needs to be spread across the area and not in large pockets which can lead to friction.
- Policy will not deliver enough AH in Weymouth.
- No justification for seeking differing rates of AH across Dorset - AHs are required across Dorset.
- Would like to see 50% AHs.
- Prioritise delivery of AHs for local people over market homes (which can be used as second homes).
- The setting of thresholds depending on viability for a scheme, as measured by the developer, is an outdated way of calculating the number of AHs.
- Support for overall % variations but should reflect land use i.e. agri should only be allowed to be developed if 45-50% affordable.
- Maximum percentage should be 10% on small housing sites and 20% on housing sites.
- HOUS2 Figure 4.1 The map is of little use because one cannot identify specific places or areas.
- Developers should not be allowed to appeal against supply of affordable housing on ‘viability grounds’.

## Paragraphs 4.3.9 - 4.3.14 - Tenure split

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### Town and Parish Councils

- Disagree with proposed tenure split – too inflexible.
- AH should not mean smaller houses and developers should not recoup costs of AH by increasing the price of other houses.
- Need for high proportions of social affordable housing for rent in perpetuity, for local people.
- Consideration should be given in the plan to short life housing.
- In the Western Functional Area housing need is largely for social rent housing.

- The tenure split should be varied to increase social rent.
- Tenure mix in Policy HOUS2 not consistent with paragraph 4.3.13.
- There is a specific need for social rented homes.
- AH should be distributed (pepper potting) across housing sites.
- Proportion of social housing needs to represent the local need and, equally important, the number contractually agreed needs to be built.
- Right to Buy sales should be restricted to Dorset residents.
- Welcome social rented AH as it provides units that are genuinely affordable to people on local wage levels.
- Plan should include reference to / support given to housing co-ops and CLTs to address the shortage of social housing.

### Community Groups

- Housing for local needs for affordable rent with no right to buy can only be delivered through a Community Land Trust.

### Homes England

- The approach to AH tenure in HOUS2(V) seems reasonable, however future consultation should provide the evidence.

### South West Housing Association Planning Consortium

- Support for a tenure split where it aligns with the findings of an up-to-date need assessment.
- Incorporating the wider definition of affordable tenures will be important in ensuring consistency with the revised Framework, and this must be done with the support of a new assessment of how these tenures will meet local housing needs.
- Reassuring that the Council understand the viability impacts associated with the delivery of social housing – pleased that policy HOUS2 allows for some flexibility in the tenure split when evidenced with viability work.
- Paragraph 4.3.14 - agree that the distribution of AH within housing schemes should allow for social integration within the overall design, but you should also consider the practical implications for housing associations when it comes to the management of their housing stock. Pepper potting makes management more difficult as the properties are more spread out. We recommend that AH is clustered across larger sites – 10-15 dwellings forming each cluster is favoured.
- Recommend that an SPD is prepared to address detailed matters such housing mix and distribution.

### Green Party Group of Dorset Councillors

- Tenure mix should be: max of 20% affordable ownership products, min of 50% social rent, and min of 30% affordable rent.

### Developers/Landowners/Agents

- Object – disagree with the application of social rent on schemes less than 10 units. Not viable, isolated schemes of AH do not serve their residents well, and they are not easy to manage.
- Paragraph 4.3.14 needs to consider the implications of management for AH. Schemes for a smaller number of units will be challenging to manage, and this will need to be considered.



- Not reasonable to impose a different tenure mix on the Gillingham Southern Extension at this late stage. The plan should note that Policy HOUS2 tenure mix does not apply at Gillingham SE, and instead include a site-specific tenure mix in Policy GILL2 to reflect Policy 8 of NDLP.
- Sites that generate a requirement for only a small number of affordable rented or intermediate units will often not be viable for RSLs to manage. Whilst the tenure split suggested in part V of the policy may be acceptable for larger development schemes, the policy should define minimum no. of affordable units below which greater flexibility on tenures will be permitted.
- The requirement for 30% social rent could reduce the total numbers of affordable homes that are delivered.

### Public response

- Agree with tenure split.
- Concern over definitions of AH – often houses remain unaffordable - more needs to be done.
- Affordable housing as referred to in the Local Plan is not “affordable” by the majority of the local population in Dorset. The term “affordable” should mean a price or rental which the local working middle to lower income population can afford.
- Need for social housing built by the council or housing associations.
- Need for starter homes as AHs with decent facilities, parking and at least a second bedroom for families to begin in.
- Tenure splits are also a constraint and prevent families from being able to move forward.
- Concern with affordability of starter homes.
- AH needs to be below £250,000 and fully owned by the person purchasing rather than part-owned by government as this means progressing up the housing ladder is more difficult.
- Local Plan cannot provide for the much-needed social housing that many parts of Dorset require as it is not viable for private developers to build.
- Suggested tenure splits need justification.
- Disagree with the suggested tenure split.
- Social rent is the highest demand and should be the highest tenure i.e., 40% social rent, 30% affordable rent, 30% affordable ownership.
- Unlikely to be viability in market housing to support delivery of low-cost housing for purchase or rent.
- Proposed houses at Colehill not affordable with the inclusion of social housing and part ownership.
- Part ownership is not good - paying rent and mortgage (plus maintenance fees and restrictions when you sell) make it a bad choice for first time buyers. Preference for truly affordable freehold little homes, cluster houses, in order to get people onto the housing ladder.
- Preference for “really affordable housing”, not just that at 80% of market prices which is still too expensive for those most in need.
- Housing, whether to buy or rent, needs to be affordable in perpetuity otherwise it will be lost when it is sold.
- The proportion and tenure of such provision must be adequate to reflect current local housing affordability needs both for sale and rent.
- Affordable rent at 80% discount is unaffordable for many local workers. Social rents at 50% - 60% of market rent are more realistic.
- Support for social rent but unclear whether it will be viable given this has not been assessed.
- 70% of AH provided in Weymouth should be made available for social rent.



- Current 80% of the market value is too high. A figure of 35-50% of the market value would be more in keeping with the typical salary.
- 80% should be Shared Ownership.
- There should be provision in the Plan for Council Housing and shared ownership.
- Concern over social housing in 'high value areas' – imports social problems.
- Rental affordable homes should be identified where these provide low cost access particularly for those in essential services that have comparatively low incomes.
- Rental affordable homes and starter homes, such as apartments, should be encouraged within the centres of employment.
- The only way to offer real help is to make these radical changes by removing the cost of land into a totally independent trust, whether charitable or otherwise. Watton Village is an example.

## Paragraphs 4.3.15 - 4.3.16 - On and off-site provision and financial contributions

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### Town and Parish Councils

- Needs to be clearer how contributions will be spent and how the contribution is calculated.
- If a site is capable of being delivered for housing then it is equally capable of being delivered for AH - financial contributions should never be permitted. Provision must always be made on site.

### South West Housing Association Planning Consortium

- Onsite AH should be the clear preference.
- In line with NPPF para 62, Policy HOUS2(III) should specify that a financial contribution instead of onsite AH should be fully justified through viability evidence.

### Community Groups

- Paragraph 4.3.15 'off-site AH' - policy HOUS2 should specify that where off-site AH is allowed, it should be near to the development, to contribute to meeting local community needs.

### Developers/Landowners/Agents

- Sites less than 10 units should pay a financial contribution – this contributes towards housing supply in the villages without creating added management costs for the registered providers.

### Public response

- On-site provision is important.
- All developments should contribute to an AH fund run by the council. The council should have the right to choose, specify and buy a proportion of larger developments, as AH.
- AH should be built on separate sites – balanced communities is a misconception.
- When paying offsite contributions, the amount paid does not compensate for the lack of AH dwellings.
- Disagrees with allowing off-site affordable housing - feels this may be exploited.

## Paragraphs 4.3.17 - 4.3.20 - Assessing viability

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### Town and Parish Councils

- Developers must not be allowed to justify lower levels of affordable housing based on "viability".
- If a developer cannot deliver the required AH in any given development, they should not be bidding for the contract.

- The open book approach will often identify that the developer has overpaid for the land, by which point it is too late to renegotiate a more realistic land value.
- AH is less viable at Colehill due to need to provide heathland mitigation.
- If the developer is arguing it is not viable to deliver the target AH, they should make a substantial contribution to its delivery elsewhere (a site of less than 5 dwellings). Smaller developments may be the only type viable in some locations and they will need additional funding.
- Questions whether AH proposals are viable. DC should produce viability evidence regarding the proposed requirements to demonstrate that the Plan is deliverable.

### Community Groups

- Developers should not be allowed to appeal against supply of AH on 'viability grounds' - planning consent should be withdrawn or very large penalties imposed.

### Cranborne Chase AONB

- Concern that assessing viability is a mechanism to avoid provision of AH. Consider refusing development, particularly on smaller sites, where the applicant seeks to avoid providing AH.

### Home Builders Federation

- Viability is important - for individual allocations and the plan as a whole - to delivery and the local plan soundness.

### Green Party Group of Dorset Councillors

- HOUS2 should make compulsory the supporting text in paragraph 4.3.17 (re. developer funded viability assessment).
- We assume that the Council will publish the viability tests that underlie the AH requirements – necessary to demonstrate that alternative proposals have been tested.

### Developers/Landowners/Agents

- Guidance will be needed on how applicants are intended to evidence attempts to secure Housing Grants - potentially onerous burden - should be possible for applicants to investigate this and simply to agree with the Council whether grant funding is likely to be available.
- Support the statement that applicants can justify lower levels of AH by providing a viability assessment.
- Assessment of viability can only take account of grant funding if it is available.
- Concern that the proposed approach to AH is inappropriate in rural areas, such as the Shaftesbury Estate, where there are higher build costs in order to meet design requirements.
- Registered providers struggle with servicing and management costs with small clusters of AH in rural areas.
- Greenfield sites are needed as they have the economies of scale to viably deliver AH.

### Public response

- Housing costs are significantly driven by land prices, so the delivery of AH will depend upon the release of affordable land.
- The required ratio of general to AHs has not been referenced - concerned that the viability section allows for this ratio not to be maintained.
- Concern with the viability loophole limiting AH provision / the 'not economically viable' get out clause should not be accepted.
- Many developers welcome AH customers such as social housing providers since a sale to them at a rate established in advance is a reliable source of income.

- Concern regarding weakness of viability arguments in terms of achieving AHs - section needs to be more robustly written.
- Cost of land needs to be removed from calculations to enable lower house purchase and rental prices.
- The only way to help local people on the Housing List is to remove the cost of the land out of the pricing equation and into a totally independent trust, whether charitable or otherwise.
- HOUS2 should be written so that developers cannot dodge their and the Council's social responsibilities.
- Methodology for assessing viability should be consulted on - viability assessments should form part of the planning application process for consultation.

## 3.2. Policy

### Policy approach

#### Town and Parish Councils

- Essential that AH proposed by developers is built.
- The occupation of homes should be controlled to prevent loss of affordable homes.
- Agree with approach - Housing in parts of Dorset is not affordable even with schemes such as shared ownership - more needs to be done to ensure homes are affordable for the younger generation.
- More AH required rather than larger homes built to meet demand for retirement homes.
- The local plan policy should delivery of those affordable homes (including those to purchase and rent) needed (as defined in the Bridport Area Housing Needs Assessment) in the Bridport area.

#### Community Groups

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

#### Dorset County Hospital, NHS trust

- Support the delivery of AH as set out in HOUS2.
- Hospital looking to deliver key worker homes that meet the overall objectives of social rented AH, but with an expanded scope of occupiers to meet this need. Policy HOUS2 should be revised to reflect these requirements.

#### Developers/Landowners/Agents

- Policy not supported by published housing need or viability evidence – comments will be made once housing need and viability evidence has been published.
- The way to deliver significant numbers of AH is by allocating greenfield sites that have the economies of scale to be able to provide them viably.
- Not clear whether Policy HOUS2 applies to use class C2 – needs to be clarified that it only applies to C3 housing.
- Object to Policy HOUS2 - Shaftesbury Estate wishes to explore innovative delivery mechanisms and tenures.
- NPs should be used to set the rate and mix of AH.
- Affordable housing 'zones' need to be precisely defined on a plan.

- The requirement for 30% social rent could reduce the total numbers of affordable homes that are delivered.
- The proportion of affordable homes delivered should be determined on a case base basis. This approach will maximise delivery where viability allows.
- The different tenures of 'affordable housing' are not affordable for those people living in Dorset (taking account of levels of industry and large employers in the area).
- Council policy should also support delivery of affordable homes/accommodation for older people.

### Public response

- Given local employment is low paid, what is needed is low-cost housing for sale or to rent with priority to local applicants - not unrestricted open market sales to all comers.
- There's not enough strength in the plan to deliver the desperately needed affordable and social housing, particularly affordable rented homes.
- Not clear how the council will ensure that affordable homes are delivered.
- Disagree with approach. Those who can't afford to buy in Dorset should not be here. "Affordability" comes at the expense of taxpayers. Don't want to subsidise other people's lifestyle and desire to live in Dorset.
- The strategy for new homes will not provide affordable homes for younger people. Plan needs to consider the implications of the Covid-19 pandemic (specifically changes to lifestyles and patterns of work).
- To keep young people in our communities there needs to be affordable housing options.

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## Criterion II.

### Town and Parish Councils

- It should be MUST not should and OBLIGATION not aspiration.

### Community Groups

- Stop developers being able to default on affordable/social housing units.
- Insist upon AH quotas in all housing development.

### Public response

- Most new houses should be affordable.

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## Criterion IV.

### Town and Parish Councils

- Housing types (open market versus affordable) should be mixed by road.

### Developers/Landowners/Agents

- HOUS2(IV) requires "good reasons for the development to be brought forward" – but this is not in NPPF para 57. Therefore, the policy is not NPPF compliant with national planning policy. Agreeing that there is 'good reason' and what those 'good reasons' adds an extra policy hurdle and this wording should be deleted.
- Suggest greater flexibility is built into Criterion IV or V of this policy to ensure it remains effective and capable of enduring the plan period - include the words - 'unless robust justification is provided to explain why an alternative split of affordable tenure is required to deliver the level of affordable housing provision sought by this policy on site.'

- May be circumstances where a greater proportion of affordable home ownership product is justified, either to adhere to the specific affordable housing needs of the area (Criterion VI of Policy HOUS2), or for site specific reasons, including viability.

### Public response

- Criteria (IV) needs strengthening - changing of words 'will be expected to' to 'must', and 'should' to 'will'.
- Criteria (IV) - does not help understanding to use jargon, e.g. "open book approach".

## Criterion V.

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### Town and Parish Councils

- AH for purchase / part buy is not sustainable, unlike AH for rent in perpetuity to those with a true local connection.
- Insert the following into policy HOUS2: 'The calculation of affordable and social rents should be based on average local earnings, rather than local market value of rental homes.'
- There is a need for social rental housing which is not reflected in this plan.

### Developers/Landowners/Agents

- Add to HOUS2(V) – "Mix should be determined on a site-by-site basis and subject to local identified affordable needs."
- Policy HOUS2(V) is unduly restrictive. It may be justified to increase the proportion of homes available for affordable home ownership beyond the 30% limit in the draft policy – redraft to allow more flexibility.
- Suggest greater flexibility is built into Criterion IV or V of this policy to ensure it remains effective and capable of enduring the plan period - include the words - 'unless robust justification is provided to explain why an alternative split of affordable tenure is required to deliver the level of affordable housing provision sought by this policy on site.'
- HOUS2(V) provides no flexibility to respond to need and local conditions and the type of development proposed. Greater flexibility should be added.
- Tenure mix in Policy HOUS2 not consistent with paragraph 4.3.13. - needs to be clarified whether social rented is to be minimum 30% or 40% and likewise with affordable rented.
- Concern regarding tenure proposals - draft policy is too prescriptive – does not allow for site-specific circumstances.
- Limiting affordable ownership products to a "maximum of 30%" of AH is contrary to NPPF para 64 – recommend that this is to be changed to "at least 30%" in order to be consistent with para 64.
- Proposed tenure split will have implications for development viability.
- Concern that 30% social rent could reduce the overall quantum of AH provided - policy should prioritise the total quantum of AH rather seek a specific tenure mix.

### Public response

- AH not accessible for local people because of low salaries and shared ownership schemes not considered appropriate.
- Affordable rent should be defined as a multiple of hourly minimum wage.

## Criterion VI.

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### Developers/Landowners/Agents

- Add “The provision of affordable housing using modern methods of construction will be encouraged subject to Policy HOUS14”.

### Public response

- New development should include a substantial proportion of one or two bedroomed homes which are likely to be more affordable.
- It does not help understanding to use jargon, e.g. “open book approach”.

## Additional criteria

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### Go South Coast Buses

- The plan should include a policy reference to AH being located at the closest point to public transport in any new development where possible.

## 3.3. Other issues

### Design

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#### Town and Parish Councils

- AH must have suitable internal and external space for families to live comfortably.
- AHs are much smaller and built to a lower standard than other parts of the development - policy should require AH to be built to the same type, size and mix as the rest of the site.

#### Public response

- Truly affordable housing with net zero carbon standards should be a top priority.

### Sustainability

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#### Go South Coast Buses

- Social housing is often located at the most inaccessible part of development which compounds both transport poverty and the ability of public transport networks to penetrate.

#### Public response

- Concerns with location of affordable housing and affordability.
- AH should be in towns.

### Other mechanisms for delivery

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#### Town and Parish Councils

- Council should encourage Community Land Trusts which limit occupation of AHs to local people.
- AH should be delivered through mechanisms that have a track record for delivering local need – e.g. Housing Associations, council housing and community-led initiatives, CLTs, co-housing and self-build.
- Dorset Council should explore options for delivering more affordable homes.
- Build ‘low cost’ housing on Council owned land and to persuade landowners to provide lower cost land at certain sites to provide for local needs.

- Would like to see creative solutions to enable local people to buy a home.

### Community Groups

- Housing associations should create AH only schemes where there is clear shortfall in supply.

### Chris Loder MP

- CLTs have huge potential to provide AH and community-centric planning. They embody the best of planning and land management; ensuring localist, grassroots, long-term stewardship of housing and community resources. Would like to see more CLTs established across Dorset.

### Developers/Landowners/Agents

- Plan should recognise that Self-build and Custom Housebuilding can provide AH.

### Public response

- Create a forum where communities can discuss solutions to the housing crisis with the Council – for example by building council housing.
- Need for housing associations to create AH only schemes where there is shortage in supply.
- Numbers and prices of “affordable” new homes should be based on need and ability to pay.
- Term ‘AH’ is widely misunderstood / unclear / can be unaffordable in practice.
- Housing in Dorset unaffordable to many - 10 times an average income.
- Council should determine the number of truly “affordable” homes needed as part of their alternative method of assessing Housing Need.
- Social housing should be run by reputable housing association to avoid residents causing problems/distress to existing communities.
- Council houses should be built to meet local needs.
- Housing delivery should be limited to 'non-profit' organisations delivering AHs.
- AH should only be sold via a housing trust to local people on the housing in need list.
- Plan should focus on delivering the real housing need, one driven by inequality of access to homes resulting from local income affordability.
- More AH required to encourage people to stay in Dorset and large scale employers.
- There is a need for affordable homes for working families, but this could be accommodated in smaller developments across the county, focusing on brownfield sites.
- The council need to better protect smaller affordable homes from being sold on as second homes or holiday lets.
- Unlikely that developers or CLTs can supply sufficient affordable rented property. Councils need to provide them.

## Affordable housing need and affordability

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### Town and Parish Councils

- Local people on low wages need truly AH.
- Challenge the view that the only pathway out of the housing affordability crisis is to build more market housing.

### Community Groups

- Recognise the high level of private sector rents and how developers are driving this up and pricing our local people out of the market.
- For those on low income, 20% or even 40% less than market rents or prices may still be unaffordable.

- The Council should encourage the building of truly affordable housing throughout the county including smaller villages.

### Public response

- AH as referred to in the LP is not “affordable” by much of the population in Dorset. “Affordable” should mean a price/rental which the local working middle/lower income population can afford.
- Disparity in housing prices and salaries – Council should not ignore this.
- AH is key to retaining younger people born or employed in Dorset.
- Shortage of AH for (younger) local people - what commitment is there to make homes that local keyworkers (i.e. those with an income < £30k) can afford?
- Social housing is not allocated to local people as a priority.
- The cost of AHs needs to reflect local earning capacity.
- The lack of affordable housing in Dorset is socially damaging (e.g. debt, people living in insecure rentals, mental health, instability in families and displacing younger people out of Dorset).
- Making housing more affordable will have benefits for the rest of the economy by freeing disposable income.

## Affordable housing in villages

### Town and Parish Councils

- Concern that villages will lose young people without provision of AH.
- No reference to AH provision in Tier 4 settlements where there is no scope for major development.

## Evidence

### Community Groups

- Need for sharp ongoing analysis of the need for and supply of all types of AHs.

### Public response

- Lack of a report on housing needs for specific groups.
- Lack of detailed assessment of housing needs (location, size and type), including affordable and social housing.
- Consideration should be given to making a robust assessment of affordability for each area, town and village in Dorset.

## 4. Policy HOUS<sub>3</sub>: Affordable Housing exception sites

### 4.1. Approach

#### Support

#### South West Housing Association Planning Consortium (represented by Tetlow King)

- Supports inclusion of a policy relating to affordable exception sites.

#### Town and Parish Councils

- Support policy and supporting text.



- Support policy – however, landowners will not release land for AH while the hope value for market housing existing.
- Policy of last resort as unlikely to be practical/viable in most areas.
- Exception sites should follow normal planning constraints to avoid unfettered creep. The current description is far too permissive and seems to be at odds with LP/NP policies. There must be community support for an Exception Site.
- Support - as developers are not keen to build affordable homes as part of their development.
- Bradpole residents have stated that there is a modest need for AH exceptions sites provided the homes are reserved for local people and they remain affordable in perpetuity.
- Exception sites should be brought forward in Weymouth, including in the town centre.
- Communities should have a role in identifying sites.

### Public response

- Agree with the approach - there should be provision for affordable housing on small sites within villages where need is identified.
- Exemption sites lead to development in the worst possible places, and generally against the wishes of local people.

## Paragraph 4.4.1 - 100% affordable housing

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### South West Housing Association Planning Consortium (represented by Tetlow King)

- Reconsider allowing market homes on site so as not to 'frustrate' the delivery of affordable homes and create mixed communities.

### Developers/Landowners/Agents

- Allow market homes to support delivery of sites.

### Town and Parish Councils

- Is 100% AH sustainable - mixed development might be better - do not want to create ghettos.
- Will 100% AH clash with areas with a NP that promotes mixed tenures?
- agree should not allow open market housing.

## Paragraph 4.4.3 - 'Connection'

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### Town and Parish Councils

- Concern that without clearer definitions of 'existing family or employment connection' then the system is open to abuse.

## Paragraphs 4.4.4-5 - 'Local Need'

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### Town and Parish Councils

- 'Local need' needs better explanation/definition – it should be determined by the local community not imposed by Dorset Council or another outside body.

## Paragraph 4.4.6 - First Time buyer

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### Town and Parish Councils

- How is a 'local' first-time buyer defined?

## Paragraph 4.4.8

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### Community groups

- Paragraph 4.4.8 – change “should” to “will”.

## Paragraph 4.4.8 - 'In perpetuity'

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### Developers/Landowners/Agents

- The restriction on affordable homes being retained ‘in perpetuity’ needs an exception where intermediate tenures such as shared ownership (with the ability to staircase to 100% ownership) and rent to buy are proposed.

### Town and Parish Councils

- Can AH in perpetuity be put into the deeds so that it is a permanent tie?
- Enquire what methods would be used to ensure compliance with policy HOUS3.IV – affordable in perpetuity.
- Agree that sites should be truly exceptional, should continue to meet local needs in perpetuity, and should exclude market housing.

### South West Housing Association Planning Consortium (represented by Tetlow King)

- However, entry level is not affordable in perpetuity so asks we remove the reference to in perpetuity unless explicitly referring to rural exception sites.

### Public response

- Protect as affordable in perpetuity and do not allow market homes.
- Agreed for small sites (up to 10) for use of local people only and affordable in perpetuity.

## Paragraph 4.4.9 - Space standards

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### Developers/Landowners/Agents

- Paragraph 4.4.9 – do not support the space standard – lack of evidence for an arbitrary restriction.

## Paragraph 4.4.10 - Market housing cross subsidy

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### Town and Parish Councils

- Paragraph 4.4.10 – support the ability of a NP to allow a small number of market homes on rural exception sites.

### Developers/Landowners/Agents

- Paragraph 4.4.10 is too restrictive and without justification contrary to NPPF. Re-word to: “National policy indicates that some market homes may be permitted on rural exception sites at a local planning authority’s discretion. Such proposals will be considered on a case-by-case basis.”.
- Paragraph 4.4.10 – not allowing market homes on exception sites could affect the ability to cross-fund and provide AHs. It may prevent schemes from funding zero carbon homes and NP process does not provide a timely method to address climate change. Amend second sentence to: “Care should be taken by local planning authority to take into consideration a wide range of factors relating to the overall benefits of a scheme, for example by meeting climate emergency objectives and providing renewable energy, before using its discretion.”.

## Community land trusts

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### Town and Parish Councils

- Community Land Trusts could help improve the lack of AH in North Dorset.
- Alternative to CLTs, allow a small amount of market value homes to encourage landowners.

## Heritage assets 'at risk'

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### Historic England

- Policy should have flexibility to allow exception sites where this would help find a long-term solution for a heritage asset that is 'at risk'.

## Self-build

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### Developers/Landowners/Agents

- Reference to 'self-build' should be linked to the definition in the NPPF to ensure the Plan allows for custom housebuilding.

## Second Homes

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### Community groups

- Support exception sites – but should not be diverted into second homes.

## Neighbourhood Plan

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### Town and Parish Councils

- Respect restrictions of existing NPs.

## Green Belt

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### Public response

- Affordable housing exceptions sites should not be permitted within the Green Belt which has also been designated as ANOB or is defined as locally important landscape/amenity value.
- Exception sites should not be allowed where villages have been extended into the green belt.

## Tier 3 settlements

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### Developers/Landowners/Agents

- Exception sites cannot be relied upon to meet housing needs in Tier 3 settlements.

## Sustainable locations

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### Cranborne Chase AONB Team

- Concerned that just using the mechanism of rural exemption sites effectively locates supposedly affordable housing in unsustainable locations.
- Those seeking affordable housing rarely have the resources to live in locations that are distant from shops, schools, and local services such as doctors' surgeries and post offices.

## 4.2. Policy

### Town and Parish Councils

- Policy title should be: 'Affordable housing on rural exception sites'; and first line of policy should refer to 'rural exception sites' rather than 'affordable housing exceptions schemes'.

### South West Housing Association Planning Consortium (represented by Tetlow King)

- Suggests making it clear whether the policy applies to both rural and entry level with entry level being widely welcomed by Housing Associations.

## Criterion I

### Town and Parish Councils

- Support, however, lack of clarity in terms of what constitutes a 'settlement' and use of the word 'adjoining'. Amend policy to allow flexibility, particularly for sites well-related but not directly adjoining the defined boundary of villages.

### Developers/Landowners/Agents

- Amend part (I) of the policy to "reasonable proximity to settlements" rather than "adjoining".

## Criterion III - Character, Scale & Design

### Town and Parish Councils

- Important that new buildings reflect local character and materials and meet the need for smaller dwellings.
- Affordable housing should not be prioritised over the natural countryside.
- Amend Point 3 to: "site is small scale with the design and character of the scheme appropriate to the location and size of the existing settlement."

### Public response

- Allow larger sites in or near larger settlements.
- Housing sites in villages should only be incremental – up to 5 dwellings.
- Bristol has built, above a car park, small, environmentally sound units for AH.
- Biodiversity measures have overtaken the housing needs of local people, prioritise design and social aspects over biodiversity.

## Criterion IV

### Town and Parish Councils

- The secure arrangements should be noted in this policy otherwise it is just a good intention.

## Additional criterion - Second Homes

### Public response

- There should be a clause / covenant for locals only and main residence to stop them being used as second homes.

## **Additional criterion - 100% affordable housing**

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### **Community Groups (non-statutory)**

- The requirement for 100% AH on these sites could be stated in the policy as well as the supporting text.

## **Additional Criterion - Village accessibility**

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### **Town and Parish Councils**

- Village accessibility must be considered – e.g. narrow roads, distance from main road, bus service, etc.

## **Additional criterion - Elderly downsizers**

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### **Public response**

- Policy should refer to use for elderly downsizers or those in affordability gap.

## **5. Housing for older people and those with disabilities**

### **Section title**

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#### **Developers/Landowners/Agents**

- Should heading be broadened to “Innovative Ways of Delivering Care” - likely to be other delivery mechanisms and further innovations in this important market segment.

### **Paragraph 4.5.1**

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#### **Town and Parish Councils**

- Paragraph 4.5.1 conflicts with paragraph 4.2.3 by stating different figures for the number of residents over 65 years of age in the plan area – should be corrected for reasons of soundness.

#### **Public response**

- If additional housing is for retired people, make it properties limited to the over 65s.

### **Paragraph 4.5.3 - 'less mobile'**

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#### **Public response**

- Many elderly people are not very mobile.
- The plan should use the term 'older people', which is the recognized respectful terminology, rather than 'the elderly'. The plan should also refer to 'those who are less mobile'.

### **Paragraph 4.5.5 - Accessible locations**

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#### **Developers/Landowners/Agents**

- CCRC's can be provided in locations where sufficient services and facilities can be accessed by residents, whether these facilities are within the CCRC themselves or at town centre locations.
- Lack of allocations for community care hubs other than existing ones – suggestion to amend the text to state that care hubs will be allocated in appropriate locations.

## Public response

- Agree with approach - Practical limitations may include access - e.g. steep sloping areas and inadequate road access for transport vehicles.
- Community care hubs best suited to Tier 1 and 2 Towns and limited suitability elsewhere.
- Need access to facilities that are usually provided in a nearby town, such as shops, cinema, leisure and fitness facilities - via bus or taxi.
- Ageing population will benefit from care hubs however, they should use brownfield sites in central locations within the settlement to prevent urban expansion and erosion of biodiversity.
- Flat routes to GP surgeries must be considered and do not seem possible in allocated sites.

## 5.1. Community integrated care hubs

### Approach

#### Town and Parish Councils

- Recognise the need but care homes have not previously been considered financially viable on Portland. There does not seem to be any detail on what would facilitate the creation of these hubs. The ideas are good but there must be support for communities to achieve these.
- Ageing population of West Dorset would be hard pressed to afford such services on their doorstep – sounds like Dorset Council is courting the wealthy.
- Support the policy approach along with Policy H5 in the Bridport Area NP.
- Planning controls on provision ensure that land can be acquired at a price low enough to enable a developer to provide suitable 'low cost' accommodation.
- The need for a 60-bed care home at Vearse Farm, Bridport should be reassessed.

#### South Western Railway

- Agreement – no practical limitations or other approaches that could be taken.

#### Developers/Landowners/Agents

- Mixing the generations has huge social benefits and, hence, provides a further reason to encourage innovation through positive, flexible policies.
- Supports the inclusion of hubs in the Local Plan, and the recognition that Continuing Care Retirement Communities should be encouraged by the Council.
- Lack of clarity on how the Council will ensure the delivery of Community integrated care hubs over the Plan period.

#### Public response

- How will people be able to afford care provision if not supported by the NHS?
- Unclear how community care hubs would be achieved.
- Support proposals but it does require a holistic approach - needs to be properly resourced.
- Support these proposals but it needs to be properly resourced. The move to 'care in the community' was motivated by good intentions but starved of resources and has left many vulnerable people isolate and lonely.
- West Dorset's increasing elderly population will proportionally need more care hubs than other Dorset areas.
- Suggestion that one size does not fit all.
- Some provisions outlined in HOUS5 could also be added here.

- Government should provide extra funding as part of its social care review.
- It would be helpful to know how much supported housing both private and housing association exists across Dorset - my impression is that there is a lot of it - certainly in Dorchester.
- Land for care accommodation should only be released to non-profit organisations – this would limit the profits from the uplift in land prices and facilitate affordable provision.
- Concern over long-term quality of care hubs and apparent lack of data over who finances them.
- Ferndown sites are not a good idea as they will increase traffic and strain on local infrastructure.
- Not all disabled people will need a care hub.
- It is not clear whether HOUS4 applies also to “community integrated care hubs” (4.5.7 et seq.) but it probably should, otherwise this class of housing has no supporting policy.

## Definition of Care Hubs

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### Dorset County Hospital NHS trust

- Support the approach in delivering community care hubs but the CCG ‘Sustainability and Transformation Plan’ definition of such hubs is far wider – the LP needs to be revised to ensure no confusion between these descriptions.

## Paragraph 4.5.7 - Extra Care

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### Public response

- Extra care housing has been around in Dorset for a long time.

## Paragraph 4.5.8 - Care villages

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### Public response

- Older people may not want care homes / care hubs and instead would prefer care villages. These are comprehensive developments which could include a greater number of facilities than the ones listed further reducing the need for the elderly to travel - benefitting both them and the environment. If care hubs were more comprehensive, they could be built in areas not previously deemed suitable as they would instead become a new settlement.
- “Care village” properties need careful siting in terms of access to the centre, medical or other wellbeing centre.
- Move away from care villages and focus on affordable housing for young people.
- Support the Bridport Gateway development, but urge the council to control the size and number of such enterprises in a particular locality.

## Paragraph 4.5.11

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### Public response

- Paragraph 4.5.11 should be included in a policy statement.

## Paragraph 4.5.10 - Affordable care units

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### Public response

- Need affordable homes for those with disabilities or who are unable to work.
- Clearly funding affordable specialist housing will be a problem.
- At the very least, all specialist developments should contribute to an affordable housing fund run by the council.

- Council could commission such housing from an affordable housing fund – may be cheaper than paying for specialist conversion of existing buildings.
- Affordable care needs to be available to everyone.

### **Paragraph 4.5.11 - Affordable housing for key workers**

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#### **Town and Parish Councils**

- The need for affordable key worker accommodation is recognised and supported.

#### **Public response**

- Integration of housing for key workers to be re-used if not needed seems confusing.
- Agrees that provision should be made including affordable provision. Central government approach to affordable social care has been neglected for years. Dorset Council could use its leverage to meet the provision of central housing targets to the provision of a solution to the long-term care problem.
- These Hubs should include affordable accommodation.
- Agree that specialist purpose-built accommodation should provide affordable housing.
- Care staff may not want to live on the developments.
- Lack of care workers could be an issue.
- For every development I would like to see provision made for affordable housing for care staff, often on minimum wage, who often end up travelling considerable distances to work.
- This approach would imply a long-term commitment by care staff which could inhibit recruitment.
- Social housing close to care hubs should be primarily available to care workers; this would also ensure the affordable housing remains in place for its main purpose.
- Definition of affordable housing for care workers needs to be clearer.

### **Other issues**

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#### **Public response**

- Communal heating could reduce energy waste and costs.
- Care hubs may not integrate the elderly into the population as the plan highlights in 4.2.1.
- Mental health may become an issue within the care hubs as the elderly are lumped together. Instead a mixed-age environment could create a more uplifting environment.
- A large majority of autistic people just need some support with socialisation and household bills.
- Location of dropped kerbs is a challenge for crossing the roads on mobility scooters in some locations.

### **Park home / residential mobile homes**

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#### **Avison Young on behalf of Burry and Knight Limited**

- Section 4.5 (including Paragraph 4.5.4) does well to outline the specific needs of older people and those with disabilities and the particular housing that typically caters for this group. There is no mention of the contribution that park home/residential mobile home based retirement parks can bring to supporting the increasing ageing population and their specific housing needs for relatively affordable single storey homes for independent living.
- Park home development directly address the needs of older people by providing the opportunity for people over retirement age to downsize into smaller more affordable low cost single storey homes that can be easily adapted at point of sale, or after sale, to suit the needs of people with



physical disabilities. This can occur in a safe environment for people from the active newly-retired to the frail elderly, within a supportive community, with ancillary community facilities and a warden to assist with general needs. This means that older people can stay independent and outside of formal care for longer, if at all, reducing the need for extra care accommodation and reducing pressure on health and social services. By encouraging those approaching retirement to downsize to park homes, this frees-up larger family homes for young families and therefore supports the wider housing market.

- Request the assessment and inclusion of the need to provide single-storey homes for independent living by older people and those with mobility difficulties, including bungalows and park homes, within Section 4.5 in order to ensure alignment with paragraph 61 of the NPPF.
- We suggest that a bullet point is added to paragraph 4.5.4 – “a significant proportion (29%) of all new homes should provide for single-storey living in single floor flats (with lift access), bungalows and park homes, with two thirds of those age restricted by condition for older people only to provide an adequate supply of accommodation for independent living by older people.”.
- Although my client supports the proposals for community care hubs, these will only provide for a fraction of the projected housing needs for older people and will largely cater for those with specific care needs. There is a much greater need for singles-storey homes. Park homes in well managed warden assisted retirement parks can provide single storey accommodation for independent living by older people at a lower cost in this market and deliver future savings in the need for full-time care homes.

## Omission site for Retirement Parks - Crane Valley

### Avison Young on behalf of Burry and Knight Limited

- Burry and Knight Limited strongly objects to the lack of any consideration of development needs of the home parks sectors and the consequent lack of any site allocations to allow for new or expanded retirement home parks.
- Burry and Knight Limited are looking to diversify the income received by their business due to the effects of the Covid-19 pandemic, as well as the trend seen within the wider golf market of a general decline in golf participation and membership.

## 6. Policy HOUS4: Specialist purpose-built accommodation

### 6.1. Approach

#### Approach

##### Dorset County Hospital - NHS trust

- Support - specialist housing can reduce pressure on hospitals and Dorset has need for all types of affordable housing. HOUS4 as currently drafted does not accord with the PPG (Reference ID: 63-012-20190626) which clearly states, “Plans need to provide for specialist housing for older people where a need exists.” As the Local Plan has identified that a need exists, it is required to go further with the plan making process as set out in the PPG.

##### Town and Parish Councils

- Support the current approach as outlined in the current wording.
- The approach on policy HOUS4 seems to cover most points.

- Developments should be integrated – not designed to segregate families, etc.
- Essential that health care provision meets the needs of new housing development and no assumptions are made about the adequacy of existing provision for an aging population.
- Consideration could be given to methods of retaining a mixed range of dwellings suitable for older residents.

### Developers/Landowners/Agents

- This section does well to outline the specific needs of older people and those with disabilities and the particular housing that typically caters for this group.

### CPRE (Purbeck & Poole)

- The proposed extra-care facilities require suitable justification, irrespective of any commercial advantage to developers that might accrue from banning pets that would damage wildlife.

### Public response

- Support / welcome / can see no practical limitations.
- The wording seems vague.
- There should be greater emphasis in the supporting text to the proportions of the population with a disability or health problem.
- Practically different needs and vulnerabilities can be difficult to manage.
- Need for extra care being provided locally.
- There is no statistical data relating to: Need for elderly and special needs housing.
- Approach begins to address concerns.
- Support for open market housing for older people.
- Doesn't necessarily create an inclusive and integrated approach.
- Agree/broadly support but note that there are already many other providers.
- Importance of enabling elderly residents to remain in their home community in appropriate housing and live independently.
- Companies like McCarthy Stone are actively building homes for senior citizens which are bringing in many people from outside the area with all the possible future problems that may bring.
- Council benefits should pay towards accommodation; being supported to stay in their own homes would help reduce costs in other areas.
- Whatever practical limitations there are need to be balanced with the real demand for these schemes that will increase year on year.
- Facilities for the elderly should consider shared mixed uses between young and old.
- Create in existing local communities and repurpose existing buildings rather than using greenfield land.
- The Council should seek to develop the equivalence of the Bridport Gateway in all its larger conurbations.
- Landlord or freeholder may be developing for a profit; DC should become registered housing provider.
- Plan says number of retirees will increase but does not make allowance for increasing inward retirement.
- Prioritise special needs over elderly as age does not represent special housing need.
- Deliver care to those who cannot afford to pay market rates. Anything else is inhumane.
- Ref covid-19, it is clear nobody will be buying a communal property without individual open space ref transmission concerns and ventilation.
- There is a need for lifetime housing and M3/M4 compliant designs.

- By implementing the lifestyle home M3 M4 care costs it will cut dramatically costs for the council.
- The council should provide council housing for extra care and council run facilities.
- Would point to projects such as the "In jolly good company" community engagement project to see that isolating different groups has some benefits, but many drawbacks.
- Use specialist housing providers to manage schemes.
- Provide loan schemes to support lower income families.

### Paragraph 4.5.15 - Affordable Units

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#### Developers/Landowners/Agents

- Disagree with providing AH on extra care, there are practical limitations.
- The question of whether AH should be provided should be applied to all forms of older persons accommodation.
- It is not practical or feasible to include an element of AH within sheltered retirement housing. Accommodation for elderly not suitable for younger people. Registered providers are unable or unwilling to pay towards the shared facilities. It is not possible to provide separate communal facilities for the AH units. Risk of conflict between the owner occupiers and the subsidised tenants.

#### Town and Parish Councils

- Social housing should be provided.

#### Public response

- It seems that 4.5.15 is asking permission to not have affordable units.
- Need affordable homes for those with disabilities or who are unable to work.
- Affordable accommodation with care is ideal but expensive to provide.
- Are affordable units being proposed alongside extra care units (which are surely all being subsidised inherently?).
- If they are to be affordable need to be somehow subsidised e.g. attendance allowance could be extended to cover this sort of communal provision.
- There should be provision of an affordable element in extra care schemes, although it won't be popular with developers, as it would reduce their profits.
- Agree that extra care should provide affordable housing – but only small developments on brownfield sites.

### Paragraph 4.5.15 - Viability

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#### Developers/Landowners/Agents

- Has viability of AH been tested against any form of specialist accommodation for older people?
- Viability testing should test the different forms of older persons housing.
- There are benefits from increasing the supply of retirement and extra care housing: people are healthier and happier, and each resident saves the NHS money. It releases larger homes back on the market. These benefits will not be realised if developers are inhibited by AH policies that do not take viability into account.
- The Viability Assessment should test the impact of providing affordable homes with specialist purpose-built accommodation – there are different considerations when assessing viability for specialist purpose-built accommodation.

- Retirement and extra care housing has extra costs due to: communal spaces such as shared lounges, etc. typically 30% of total floorspace; higher build/design standards to support older people; brownfield sites have high remediation costs; all construction costs upfront unlike normal housing as customers need to see the completed development to have the confidence to buy.

### Public response

- Create collaborative finance to secure long term viability. Via a cooperative, social enterprise that secures adaptable housing for everyone. Check what other countries have done.
- Concerns with viability - this may need to have cross subsidisation to deliver specialist accommodation for the elderly.
- The burden of funding extra accommodation should be equally shared.
- Market rates for care tend to be very high, because: a) margins wanted by providers are unrealistic; and b) bureaucracy is too cumbersome - requiring trained, expensive, administrators. Suggestion to provide via a social enterprise, and could use volunteers.
- Suggestion of cross subsidisation with some open market housing - could also be housing for the elderly, eg bungalows.
- If housing is provided on a Community Land Trust site, capital costs should not be so high, making the support costs more viable.
- Housing should be funded by specialist housing providers where residents can be supported to gain life skills and move into independent living/peer supported living.

## Paragraph 4.5.16

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### Developers/Landowners/Agents

- Is paragraph 4.5.16 too restrictive? - does not look consistent with Policy HOUS4, which makes no reference to Policies HOUS1 and HOUS2 - unclear how these policies will be applied.

## Definition of Specialist purpose built accommodation

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### Developers/Landowners/Agents

- Disagree that extra care housing is automatically C3 – there is significant variability in specialist housing. Appeal decisions have confirmed that it can be C2 or C3 depending on the specifics. It is wrong for the LP to require Extra Care Housing to always provide AH. Instead, it would be appropriate to require an applicant to demonstrate why a proposed development is C2 rather than C3.
- The Council cannot decide whether extra care housing falls within C2 or C3 through a LP policy. Each scheme needs to be considered on its own circumstances.

## Accessible locations

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### Town and Parish Councils

- Does not appear to have any locational criteria - presumably relates to provision within settlement boundaries, but this is not clear from the supporting text.

### Public response

- Suggest a third bullet to Policy HOUS4 to specify that the proposal must be in a location which gives residents ready access to a centre of population.

- Ensure living costs are minimised by locating near to subsidised public transport, good value shops, well insulated and properly constructed properties.
- An accessible location is absolutely key - within a town or on a good public transport network.

## Bungalows

### Town and Parish Councils

- A policy to control the conversion of bungalows to chalets, particularly in rural locations, would be an opportunity to retain accommodation suitable for older residents.
- Land use is an issue as bungalows need a bigger footprint for a property of the same floor space.

## Infrastructure

### Town and Parish Councils

- Future development should include infrastructure to sustain an increase in the elderly population – ‘Abbeyfield’ (Beaminster) is a good example.

## 6.2. Policy

### Criterion I

#### Public response

- The policy should say that an affordable element ‘will’ be provided in extra care schemes, rather than ‘should’.

## 7. Policy HOUS<sub>5</sub>: Residential care homes

### 7.1. Approach

#### Approach

##### Developers/Landowners/Agents

- Plan is unsound as it doesn't identify the pressing need for additional C2 care provision.
- Policy offers no flexibility to enable adaptability to the changing needs of the care sector over the life of the plan to 2038.
- Support for approach which will ensure care accommodation is supplied where needed.

##### Community Groups

- Instead of restricting care homes to only people with dementia and other specific needs, they should cover all forms of later life and care accommodation.

##### Town and Parish Councils

- Support the current approach as outlined in the current wording.
- We should be planning for more care homes, as the need is already identified.
- Policy needs to ensure that local need is addressed and that it does not provide an avenue for executive retirement homes instead.
- Should only be built if there is a local identified need and staff availability.
- Ensure health care provision is able to accommodate additional pressure from care homes.

- Some of the best Residential Care Homes are in rural locations.
- Plans states that demand for spaces in care homes is falling, but also points out that there is a high percentage of elderly people in Dorset.
- We should also be addressing the funding formula for such places as this may be why the spaces are not being filled.
- Residential homes are a must for those who cannot look after themselves not just for those with dementia or needing nursing care.

### Public response

- Disagree with the Policy.
- Better to encourage older people to live in their own homes with support where possible.
- Existing services are expensive and low standard; council/social services should pay same as private residents.
- It is not the function of the planning system to manage market competition.
- Accommodation for the elderly / less mobile should be restricted to local residents.
- Need to be of a good standard of care and support both staff and residents.
- Local authority should run care homes instead of 'asset strippers money men'.
- Overdevelopment of 'Churchill' type retirement homes are 'primarily property investment vehicles' without community benefit.
- Insufficient care home places.
- These facilities need to be accessible via public transport/geographically as visitors and care workers might be reliant on the ease of such.
- Support as more beds will be needed for long term care problems such as dementia.
- How realistic is this? Council should partner with specialist providers to explore what can make the costs more realistic.
- This will become more of an issue in Dorset due to our aging population, need Govt. to provide an integrated approach or it will continue to drain LA resources; Local policies will not solve the problem.
- Work with neighbouring councils where the hospitals, schools, fire services and police are to provide cooperative approach.
- Retirement homes in Dorset are priced too high for people living and retiring in the area. Even if you have a property to sell many retirement homes are far too expensive.

## Paragraph 4.5.18 - Decline in need for traditional care home

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### Developers/Landowners/Agents

- Paragraph 4.5.18 provides no evidence in respect to the decline in need for traditional care, or to forecast future need.
- Somerston have commissioned consultants Three Dragons to investigate the need for C2 provision. They confirm there has been a downward trend in the occupancy of residential care home beds but also states there is an increased demand for nursing care beds for people approaching end of life and those living with long term health conditions. Report concludes there should be 25 care beds providing personal care per thousand of the population aged 75+, and care beds providing nursing care should be 45 per thousand aged 75+. This is forecast to lead to a substantial shortfall in care home beds by 2025.

### Community Groups

- The current decline in demand for these facilities could change – we therefore cannot see the value in a ban for such uses.

## Paragraph 4.5.18 - Settlement Hierarchy or Public Transport Corridors

### Town and Parish Councils

- It is not sufficient to locate facilities on a public transport corridor, unless there is a demonstrable way of providing additional public transport on these corridors.
- The larger (Tier 3) villages can potentially provide care provision close to local facilities where there is a GP surgery or outreach branch.

### Environment Groups (non-statutory)

- Being on a transport corridor does not mean that public transport will be adequate for staff and visitors. A minimum requirement for public transport services should be specified.

### Community Groups (non-statutory)

- Care homes should be close to town or local centres with shops and appropriate facilities and access to public transport.
- Care facilities need to be in areas where the population is still able to access the services and social elements to sustain a good quality of life.

### Public response

- An accessible location is absolutely key - within a town or on a good public transport network.

## Definition of Housing for complex dementia and nursing care

### Developers/Landowners/Agents

- HOUS5 should be amended to provide support for all C2 uses.

## Site opportunities

### Developers/Landowners/Agents

- Support for policy – Frenches Farm, Upton, provides a good opportunity to deliver a nursing home at the edge of a Tier 1 settlement with excellent connections.
- Given the findings of the Three Dragons report, the Dorset LP should identify and plan for the level of care provision required, including identification of appropriate sites/locations.

## 7.2. Policy

### Criterion I

#### Developers/Landowners/Agents

- Care homes can provide residential and nursing care. Amend first sentence of policy to: “Residential Care Homes will only be permitted where they respond to a specific evidenced need for residents who require round the clock care.”
- HOUS5 bullet points 1 and 2, the ability to provide day care to the wider community is dependent on the operational requirements of the specific care provider. Add “where appropriate” to the end of both bullet points.

- Support for bullet point 3 regarding provision of outdoor space for residents' wellbeing.

## Additional Criterion

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### Public response

- This policy should be amended to ensure older peoples' housing proposals have a flexible requirement with no prescribed mix of units.
- Consider how the partner of the 'patient' is treated. Can lower dependence rooms in the same complex be provided for them?
- Space should be arranged to allow family visits without compromising patients' safety, with glass areas where visitors can be seen during a Covid Emergency.
- Policy makes no mention of the fact that a substantial amount of the current care home capacity is of indifferent quality, and there is a need to encourage the sector to upgrade the overall quality level.

## 8. Policy HOUS6 Self-build and custom-build housing

### 8.1. Approach

#### Overall approach

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##### Development Industry

- The Council's open and varied approach to self-build and custom build housing is welcomed and generally supported.
- Policy is too restrictive - instead have a policy that permits self-build houses to a proportionate level in all settlement tiers.

##### Town and Parish Councils

- Support the current approach as outlined in the current wording.
- The Council should not limit the size of a property being self-built just because they have a set idea of the required size of houses. Each application should be taken on its merit not by dictate.

##### Public response

- Support the inclusion of self-build housing in this plan.
- Like the tone and ambition of the self-build paragraphs.
- Self-build is the 5th largest housebuilder in the UK.
- This policy is far too lax.
- Each planning application for self-build homes should be considered on its merits.
- Self-build is marginal to the housing supply but should still be encouraged.

#### Within development boundaries

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##### Public response

- Allow self-build of high quality design in development boundaries or immediately abutting developed land.



## On strategic housing allocations

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### Development Industry

- Support the Council's approach to encouraging self-build and custom build housing, further clarity is needed as to whether this is a requirement on all housing schemes, only qualifying sites or at the developer's discretion?

### Rural Solutions on behalf of Leaper Land Promotion Ltd

- It is Leaper's own experience that whilst the need for Custom and Self-Build plots varies in terms of requirements and preferences, demand usually seeks an edge of settlement location rather than one being incorporated within a strategic large-scale development.
- A reliance on strategic sites alienates smaller developers which specialise in delivering Self-Build plots to meet local needs.

### Public response

- Self build plots should be provided on the proposed housing allocations.

## Outside development boundaries

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### Development Industry

- Individual self-build and custom-build build plots should also be allowed adjacent to development boundaries to allow more flexibility to approach and location reflecting the requirements of the self and custom builders.

### Rural Solutions on behalf of Leaper Land Promotion Ltd

- We would also like the council to reconsider allowing Self and Custom-Build Housing to be delivered outside of settlement limits where there is an identified need for such housing.

### Public response

- Supports sustainable (which make use of passive energy systems) self build housing outside settlement/development boundaries.
- A self built and custom built house should be permitted outside or outside and adjacent to the settlement boundary where the house provides a high level of sustainability and passive energy efficiency for use as a primary residence.
- Would like to see more self build housing on smaller sites outside the development boundary in accordance with a design code and energy efficiency.
- More active support for permitting small scale development self build on village corners and outside of development boundaries, might increase quality development for local or long stay residents.
- Self build should not be allowed outside the DDB and there is no reason why they cannot be of individual good design.
- I cannot see any controls to stop speculative building.
- Self build homes could lead to inappropriate development.

## Affordable Housing Exception sites

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### Cranborne Chase and West Wiltshire Downs

- This AONB is concerned that Policy HOU6 could be misinterpreted at item ii where custom house buildings schemes appear to be permitted on affordable housing exception sites. This would appear to provide a loophole for bespoke house building outside of the development

boundary that would not be tied down to self-build affordable or affordable in the usual sense of the term.

### Public response

- If self build are to be allowed on exception sites then it is imperative that they are not sold at full market value following the first and all subsequent sales.
- Policy HOUS3 can't be implemented in Lyme Regis. Keep social housing we have for people living here. Make Lyme Regis an exception.

## Replacement, Subdivision or Conversion

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### Public response

- The reference to self-build houses outside the settlement boundary should be removed unless a replacement or conversion of an existing residential building.
- The conversion of barns should not be permitted.

## Design Codes

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### Development Industry

- Whilst by their very nature self-builders and custom builders wish individuality and independence which doesn't work on larger developments where a coherent multi-unit approach is required.

### Rural Solutions on behalf of Leaper Land Promotion Ltd

- We agree with this requirement and recognise the importance of Design Codes and the value these bring to the overall quality of the development.

### Town and Parish Councils

- Agree, the Council should identify sites for self/custom build housing however would question as to why any proposal to build 5 or more units on the same site should have some consistency of design. The Town Council believe the town or parish council should be consulted.
- Query whether any design code exists, and if a Design Code is acceptable for Self-Build, should it also be considered for all development?

### Public response

- The requirement to build to a design code seems contradictory to the concept of custom-built dwellings.
- It is not acknowledged that the needs of none nuclear family households is not met through commercially built estates and that self build allows residents to build to meet their actual needs.
- We should probably be considering more favourably people's desire to build self-sustaining homes of moderate size.
- Planning control should be rigorous to ensure that the design is in keeping with the local community.
- Self-build innovative home should be encouraged.
- Self build houses add greater diversity to traditional housing and are often more innovative than those provided by traditional developers.
- If the right design codes are in place, then good looking houses with the very highest environmental standards should be self built. It will help revitalize villages where no new building has taken place in decades.

## Neighbourhood Planning

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### Public response

- Disagree that a neighbourhood plan and parish council are truly representative and reflecting the wishes of the local community.
- The significant cost savings that can be made by a group of locals building together could help with local housing needs and community development.
- Should be a matter for each town/parish council to decide - with proper consultation with residents.
- These sites are likely to be on the boundaries of settlement and not within existing neighbourhood plans as this Policy is new.

### Town and Parish Councils

- Whilst this is identified as a non-strategic policy, it may still be useful to clarify in (ii) that self-build and custom-build housing can also be supported on sites outside of development boundaries if sought through Neighbourhood Plans.
- Amend section II of the policy to ensure compliance with Neighbourhood Plan policies and safeguard against subsequent sale on the open market.
- Welcome the facilitation of self-build housing through Neighbourhood Plans as a means of controlling the location of such development.
- This policy must align with policy H7 of the Bridport Area Neighbourhood Plan.

## 8.2. Policy

### Criteria I & II

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#### Town and Parish Councils

- The provisions in (i) and (ii) here are sufficient. Any site suitable for more than two houses should be made available for 'normal' development.

### Criterion II

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#### Cranborne Chase AONB Team

- Concerned that item ii could be misinterpreted where custom house buildings schemes appear to be permitted on affordable housing exception sites – potentially a loophole for bespoke house building outside of the development boundary.

### Criterion III

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#### Development Industry

- Part III of draft Policy HOU6 should be deleted as the need for a design code for schemes where five or more self builds are proposed is unclear. It would not help to create variety and it is not clear why the threshold is set at five units, which seems illogical & contrary to the spirit of self builds.

### Alternative approach - Percentage policy

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#### Development Industry

- Welcome that there is no onus on sites of a certain threshold to deliver any such plots and that it is a matter of choice.

- The creation of such plots on large development sites would be inconsistent with the desire to develop coherent and well-designed places.

### Public response

- A proportion of any development site should be allocated for self build homes.
- There should be a criterion in the policy to force developers to provide serviced plots as a percentage of total number of homes for a particular site (say 5%). This helps make the provision of land more democratic and less in the complete control of a small number of large developers.

## 8.3. Questions

### Question 1: Do you think the Council should identify sites for Self / custom build housing?

#### Development Industry

- The Home Builders Federation considers that the council should identify sites for self and custom build housing.
- Strong justification for the allocation of sites which are developable and can be brought forward without delay.
- Any requirement to include self and custom build plots on strategic housing allocations will not only have on-site implications and practicalities but may potentially raise issues in relation to viability and thus the site's developability.

#### Mission Planning on behalf of Leaping Deer Ltd, Policy CRS7

- Yes, it is critical that the housing needs of all are considered within the emerging plan, this includes custom and self-build options.
- The government are clear that the provision of self and custom build options is very much part of the housing strategy to deliver a range of options.
- The Self-Build and Custom House Building Act 2015 makes it clear that there is a national policy requirement to consider this type of development.
- Furthermore, the SoS for the MHCLG has made it clear in a statement in October 2020 that the provision of self and custom build plots needs to increase.
- The Planning White Paper notes the provision of custom and self-build units will play a part in housing delivery in any future iteration of the planning system.

#### Vortal Homes Ltd, Omission site

- The Plan fails to make suitable provision for Self-build and Custom Housebuilding
- There is a legal duty on the council to keep a Self-build and Custom Housebuilding register and have regard to that register when carrying out its planning, housing, land disposal and regeneration functions. Council also has a legal duty to grant sufficient 'development permissions' to meet the demand for custom and self-build housing on an annual basis.
- NPPF complements legal requirements - LPA to plan for needs of different groups with specific housing requirements - as part of overall housing need.
- Policy HOUS6 fails to set out an appropriate strategy for meeting local demand over the plan period and is unlikely to have any practical effect on bringing forward serviced plots on sites - impact on ability of the Council to meet its statutory duties with regard to self-build and custom housebuilding.

- Have assessed the current demand for self-build and custom housebuilding and conclude that there are almost 1,000 people who are actively looking for an opportunity to build or customise their own home in the North Dorset area.

### Rural Solutions on behalf of Leaper Land Promotion Ltd, Omission site

- The current wording of Policy HOUS6 needs to be strengthened to provide clear support to facilitate the delivery of Custom and Self Build housing sites, reflecting both the government's aims and the local need for housing of this type of housing.
- The proposed strategy relies on plots coming forward on an ad-hoc windfall basis or as part of large-scale strategic housing allocations. This is unlikely to meet the local needs identified for Custom and Self Build homes, a more overt focus is needed on the allocation of specific Custom and Self-Build housing sites to address this.
- In reference to the local need, a Self-Build Needs Assessment (Iceni Report) was recently prepared. The report confirms that North Dorset is an authority with one of the highest levels of demand for Custom and Self -Build homes per capita in England and ranks 19th out of 310 authorities. There is an unmet need for suitable and serviced plots of land within the area. As of 31st April 2020, there have been 281 registered expressions of interest in a serviced plot of land in North Dorset, pointing towards strong demand.
- Leaper believes this form of development will play an increasingly important role in the government's ambitious targets for housing delivery and that this type of housing is a key issue for the Dorset Council Local Plan moving forward.

### Town and Parish Councils

- Having a stock of potential sites is a good idea.
- The Council should not allocate specific sites for self-build.
- There need only be a policy requirement to deliver self-build homes on larger housing allocations - small and medium sized developments will be identified on an ad-hoc basis and delivered as windfall.

### Public response

- Agree should identify sites for self build.
- Disagree with identifying sites - small part of provision - but it should be allowed.
- No actual provision has been made due to no opportunities arising.
- Suggest that those interested in self-build should suggest their own sites.
- Provide council owned land at lower cost to allow more people to afford this route.
- The council should identify sites for self / custom build housing.
- Ask the Town Councils. Land is always available.
- Disagreement with council identifying sites, no suggestion of additional sites.
- Yes, but unsure of where the benefit would be? Publicising and clarifying the types of site suitable for self build as you have done quite clearly would seem to be sufficient.
- Agree, more housing is needed in villages as well as towns.
- The council should not allocate specific sites for self-build - the provisions in (i) and (ii) here are sufficient.

## Question 2: Can you suggest any additional sites which could be allocated for this purpose?

### Vortal Homes Ltd, Omission site (LA/GILL/006, 007 & 008)

- The draft Plan should allocate Land to the West of Colesbrook Farm, Gillingham for self-build and custom housebuilding-led development with associated community facilities (SHLAA Ref LA/GILL/006/007 and 008).
- The site, which is approximately 20 hectares in size and adjoins the settlement and lies approximately a mile from the town centre of Gillingham, is available for development and could be brought forward without delay to meet some of the demand in North Dorset and the Gillingham area.

### Rural Solutions on behalf of Leaper Land Promotion Ltd, Omission site (LA/CHOK/004)

- Leaper has promoted the site for a housing allocation through the 2019 Call for Sites process and submitted an outline planning application (2/2020/0749/OUT).
- Develop land by the erection up to 65 No. dwellings (Custom and Self-Build homes (plots)) including a 40% provision of affordable housing; form vehicular access, public open space with play space and landscaping. (Outline application to determine access).
- Policy HOUS6 should help identify sites for Self and Custom-Build Housing and we believe that the Land East of Gold Hill Business Park , Lower Common Road, Child Okeford should be put forward for allocation for this purpose (LA/CHOK/004).

### Town and Parish Councils

- No suggestion of additional sites for allocation - up to individuals subject to all other planning guidance.
- Consider that self-build sites should be identified by local communities.

### Public response

- We would recommend a site to the rear of 'The Saxon Inn, Gold Hill, Child Okeford, Dorset' which as a loss-making public house could easily support one or two self-build properties to the rear.
- There is a vacant Orchard immediately to the North West abutting the development boundary. The owner would consider for open market Housing.
- Land put forward under the SHLAA should be considered where no housing allocation has been made.

## 8.4. Other issues:

### High Environmental Standards

#### Society of St Francis, Hilfield Friary

- Self build should enable innovative low carbon design.
- The Dorset Climate Action Network details the importance of using more local wood, and materials like straw bales, with less carbon emitting cement.
- We considered adding an extra guest cottage, using our biomass district heating system and other existing infrastructure.
- We would build as much of it ourselves, perhaps using straw bales and a solar roof.

## Town and Parish Councils

- There should be a very clear focus on environmental issues in design standards.

## Public response

- Ensure they incorporate surface water management such that no net increase in flood risk down stream of the development.
- They must meet the net biodiversity gain criteria (ecological emergency).
- Any self build house must meet stringent energy and water efficiency standards and ideally be energy self-sufficient through design and on-site generation.
- Self build increases the quality and sustainability of property since the owner/developer typically actually wants to live in it longer term, unlike builder developments where profit is a key driver.
- The use of ground & air source heat pumps is still not widely encouraged in the UK.
- Dorset could drive more green technology and become local leaders, by encouraging this mindset could enhance its reputation.
- Self build and custom build should be permitted where house uses passive energy efficiency and for primary residence.
- Respondent supports self build housing provided it is affordable and a sustainable 'zero carbon' design.

## Self Build Register

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### Public response

- The register does not appear to be transparent.
- The sign-up fee is excessive.

## Community Land Trusts

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### Public response

- Community Land Trusts and other community led housing groups such as Ecological Land Cooperative, find it almost impossible to compete with high land prices.
- Planning Authorities 'say' they support CLT's however the planning system is not conducive towards community led projects.
- Why not favour bodies like Community land Trusts who have benefit to the community as their raison d'etre rather than profit.

## Minimum Occupancy & Community Infrastructure Levy

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### Town and Parish Councils

- Self build housing is being used as a mechanism to escape paying CIL contributions.

### Public response

- Self-build houses are supported provided there are adequate measures in place to ensure they cannot be exploited by developers i.e. a minimum occupancy before they can be sold on the open market.
- Self builds must be lived in by the builders and not immediately sold on for a profit.
- Higher revenue on plot sale for the council compared to bulk sale to developer.

## Affordable Housing

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### Town and Parish Councils

- Self-build could be encouraged as it should be cheaper than buying from a developer depending on the cost of the land itself. It might encourage local people to build for their families.

### Public response

- Self-build housing can support entry into home ownership.
- All new homes need to be affordable.
- There is a small mention of encouraging self-builders, but this is one of the ways to make home ownership more affordable and thus accessible to local people. There should be more effort to help people build.
- Only if the applicants can prove that to self-build is their only way to own a property. If not, the scheme will be taken up by speculators who should, instead, rely on the market.

## Priorities Housing (Local connection / young people)

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### Public response

- It would be good if younger, local people had first refusal on plots.
- This is a really excellent idea and can be a way for younger people to afford the space they need for a family.
- Local connection and involvement in the community.
- Tiny houses and flat pack houses so that accommodation for young people, singles and the elderly can be truly affordable, innovative, natural and cost-efficient.
- The provision of sites and opportunities to redevelop existing properties seem to me an ideal way to retain a mix of properties rather than designating small areas of one type which would perhaps restrict the integration of younger starter families.

## Disruption, health & safety

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### Town and Parish Councils

- There should be controls to ensure that construction times of self build homes are not excessive.

### Public response

- Concern regarding the length of time it can take for individuals to build a house themselves and the impact on the wider area.
- A time limit needs to be set in regard to the start and completion of development and greater scrutiny in regard to health & safety not only on site but also the environmental challenges faced by surrounding occupiers.
- There is no mention of the negative impact on homes in the nearby vicinity of self build and self-conversion properties where work may progress on and off over several years.

## Brownfield Land

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### Public response

- Self build homes should be permitted in the countryside where it can be demonstrated that they are built on previously developed or brownfield land.
- Agreement with provision of self-build sites on brownfield sites only.



## Green Belt & AONB

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### Public response

- Self or custom build must not be on green belt.
- Do not support self build homes in the AONB, on land which is defined as locally important landscape or other local amenity land and self built homes should be properly landscaped.
- Suggest these areas should be where green belt is released.

## Skills and education

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### Public response

- There are many skilled people who are capable of self-building but there is a shortage of project management and financial planning skills.
- Set up mentors for people to contact.
- If there is publicity and education, development could be led more fairly by who wants to undertake development, rather than homebuilding being an inherently profit motive, based activity.
- Were self and custom build to form a 'leading' aspect of policy strategy, such measures would significantly cultivate, enhance and promote far greater favourable individual, local and national interests in every conceivable respect in the immediate to the medium term, and for decades to come.

## Housing targets

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### Public response

- There should be a clear target for self build proportion of development.
- Where any properties are built in addition to larger developments, these should be counted towards the "target" numbers, and any subsequent developments should be reduced by the equivalent number.

## Evidence Base

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### Development Industry

- NPPG - local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources, to understand and consider future need for this type of housing in their area.
- The evidence base supporting the policy has not been published by the council.
- There are several practical issues with providing self / custom build as part of large strategic sites that should be considered by the evidence base.
- Lack of evidence that council has assessed the demand for self-build and custom housebuilding or that it is meeting its duty under the Act.

### Public response

- There is no statistical data relating to the percentage of self and custom built houses.

## Modula Homes

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### Town and Parish Councils

- Modular homes should not be dismissed.

## 9. Second Homes

### 9.1. Percentage of second homes

#### Background information

##### Town and Parish Councils

- Weymouth Town Council would like to address the increasing levels of second home ownership and would like to discuss how this can be addressed either in the local plan, neighbourhood plan or be discouraged through higher council tax.

##### Public response

- Description of the issue is inadequate.
- This section of the Plan should have used background papers to provide conclusions such as the use of neighbourhood plans and taxation to solve local issues.
- The issue is more contentious than it needs to be - due to lack of suitable supply of different tenures of affordable housing.
- Need to discourage second home ownership – currently this is too weak.
- Need for robust supporting evidence to better understand and define the issue of second homes (note that Bridport NP proposed policy was rejected).
- There should be a detailed examination of which model will be best to minimise second homes.
- No conclusions to this problem in the plan.

#### Definition of second home

##### Dorset Action

- Need to include holiday lets into the second homes figures to get a true picture of the problem.

##### Public response

- There is a need to define what a principal residence/second home is.
- Definition of second homes need reconsideration. The definition should include holiday lets.
- Second homes figures do not take account of holiday let investment properties.

#### Paragraph 4.7.1 - Second Homes Data

##### Town and Parish Councils

- Questions the percentage quoted as this doesn't include holiday lets and could be out of date.

##### Public response

- The Plan should state more clearly the date and source of the second home figures.
- Need to collect better data on second homes - the issue is worse than is presented.
- Need 2021 second homes data as the number will have gone up since 2011.
- Figures do not reflect the scale of the problem.
- An audit would obtain accurate figures.
- Figures on second home ownership in Dorset vary according to the source, some up to the same levels as St. Ives.

- Introduction and 13.1.4 figure on second home ownership in Swanage differ. Studland villagers also believe second home ownership percentage to be much higher than this report suggests. DC should therefore establish a reliable method of calculating an accurate percentage of second home ownership and adopt similar prevention policies to St. Ives.
- Council Tax records used to establish level of second home ownership has been shown to be inaccurate and instead ONS census returns have been used to establish a better understanding.

### Figure 4.4 Percentage of second homes by area

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#### Public response

- Figure 4.4 may not have the correct colour for Winterborne Stickland.

## 9.2. Areas with high numbers of second homes

### Coast & rural areas

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#### Dorset Climate Action Network

- Concerned that significant areas within the county, mainly along the coast but also in certain inland rural areas, that have proportions of second homes as high as between 5 and 26%.

### AONB

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#### Dorset AONB

- Clear correlation between AONB and second home levels.

### Purbeck

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#### Dorset AONB

- Supported principal residence policy in Purbeck Local Plan.

#### Town and Parish Councils

- Trend of second homes in Purbeck – occupancy amongst highest in Dorset (check Arne).

### West Dorset

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#### Public response

- West Dorset particularly struggle from second home ownership.

### Poundbury

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#### Dorset Action

- Poundbury empty of permanent residents. It is a lonely empty place.

### Sherborne

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#### Public response

- Sherborne has a number of second homes.

## West Lulworth

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### Public response

- West Lulworth victim to influx of second homes at the detriment of the community - during winter and lockdown not possible to buy a pint of milk in Lulworth.

## Studland

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### Public response

- 44.5% of the homes in Studland are not lived in as permanent residences (study carried out by Studland Stores in June 2016).

## Swanage

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### Town and Parish Councils

- Swanage has high level of second homes. In Swanage, the negative impacts of too many second homes are starting to outweigh the benefits of second homes.
- For example, too many second homes have resulted in increased housing costs; closures of long standing small businesses; dwindling membership in local clubs (Swanage lions has closed); limited long term rental opportunities; concerns about elderly people being isolated in their neighbourhoods.
- Parts of Swanage have been subject to flat development and have no permanent residents living in them at all.

## 9.3. Impact on local communities

### Increases in house prices

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#### Town and Parish Councils

- Inflating house prices – second homes purchased by those who earn much higher salaries than local people.
- Locals are disadvantaged.
- Families are divided due to housing across the board becoming unaffordable.
- New open market homes are more likely to attract more retirees and second homeowners.
- Concern with existing numbers of empty houses in Dorset and BCP - would be good to see if and how these could be brought into use.

#### Public response

- Policies on second homes have unintended consequences - raising house prices.
- Inflating house prices.
- Removing housing for local people.
- It reduces the available housing stock for local people and pushes up the price of housing in general locally.
- Local residents may be pushed out of areas leading to longer commutes and an unsustainable societal model.
- Young people move away for jobs and housing.
- Local issues of second homes impact the countrywide property market.
- Second homes and holiday lets – lead to increased land values/higher value properties.

- People should be able to afford homes in the communities they live and work in.
- Buy to let has a greater impact on availability of affordable housing than second home owners who gravitate towards sea views and chocolate box thatched cottages.
- If housing need is over-estimated, then many of the surplus houses will become investment properties, second homes, or 'market rental', none of which helps house local people.
- There is no guarantee that new housing won't provide more second homes.
- Second homeownership is a problem, but the background paper does little to support the issue with no recommendations.
- A great deal of the housing stock is empty most of the year as it has been taken up by wealthy second homeowners.
- The increase in housing is often driven from profit, as many are bought as buy to let, or as second properties for people from outside the area.
- We are just building houses that will inevitably become second homes, pushing prices up, rather than building houses that local people can live in.

## Lack of spend in the local economy

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### Town and Parish Councils

- Second homes do not make a valuable contribution to the local economy or community.
- Business struggle to survive.

### Public response

- Economic benefits to second homes offering holiday lets or refurbishment.
- Dorset benefits from tourism as a major part of its income.
- They bring wealth.
- Second homes are in two categories with different outcomes for the economy: Second homes for business use are an asset to the local economy and do pay business rates.
- The benefit to tourism and economy of the location is having work, income and accommodation in second homes for holiday rental for all or part of all the year. These property owners should pay Business Rates.
- Second homes for personal use contribute less income, work and economy benefits than holiday lets to the location through tourism. Second home owners could pay higher Rates than Community Charge at present.
- Appear to be economic benefits to second homes - holiday lets and/or refurbishment.
- Second home ownership brings both direct and indirect employment to the locality particularly if they are also rented out as holiday homes.
- Second homes make some positive contributions in supporting the local economy (builders/gardeners/decorators).
- Second home ownership helps tourism and therefore the economy when occupied.
- Suggestion that WDDC have previously calculated that second homes do not add much to the local economy.
- We shouldn't discourage holiday lets in Dorset which relies on tourism.
- Owners can bring expertise and new ideas.
- Air BnBs also need addressing.

## Impacts on village life

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### Town and Parish Councils

- Creating ghost villages.
- Second homes can be a destructive influence on communities for all the reasons stated in the Plan – however there can be a balance.
- Second homes considered a major issue in Dorset Council.

### Public response

- There should be a survey to study the impact of second homes on communities in Dorset.
- Establish what proportion of second homes in a community results in a community becoming ‘hollowed out’ – it seems to be between 15 and 20%. Restrict second home ownership once villages reach this threshold.
- There are some villages where there are more second home/holiday lets than homes occupied as a prime residence.
- Creating ‘ghost villages’ where too few homes are occupied full time.
- Reduced full time occupancy, leads to a breakdown in community cohesion/resilience.
- Holiday homes generate low morale and insecurity of villages during winter seasons which further places suffering on local industries too.
- They are not sustainable for communities.
- Many second homes are underutilised.
- Too many second homes result in the closure of the village shop, pub, post office and a diminution of community.
- Dorset attracts many retired people from elsewhere in the country, and has a disproportionate number of second homes and holiday homes.
- Problem does not seem so great in Dorset as some other areas, but it could become more pronounced.
- There is also a need to address empty and abandoned houses too - plan says nothing about putting empty or existing buildings back into use.
- Requires policy to engage with recovery of underutilised existing residential properties and empty property development. There is a need information about residential properties that are no longer homes.
- Second homes, despite being sometimes advertised as holiday villas, are more often than not empty.

## Impact on housing supply / environment

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### Dorset Action

- If second homes are banned there will be less need to build new homes.

### Public response

- There would be less need for new housing if properties weren’t purchased as second homes.
- The number of second homes drives more house building with detrimental effects on the environment.
- Emitting further greenhouse gases in a time of Climate Emergency.

## 9.4. Principal residence policy

### Paragraphs 4.7.4-6 - Principal residence policy approach

#### Dorset AONB

- Recognising the policy might result in a number of issues, it is considered the most effective approach available.

#### Dorset Climate Action Network

- Suggestion that a principle residence policy as per St Ives may not be appropriate in Dorset in view of the wide dispersal of second homes in the county and the fact that few new homes are likely to be built in places most popular for second homes.

#### Developers/Landowners/Agents

- Support for conclusions of background paper – that it would not be appropriate for Plan to impose a residence policy.
- Support for detailed work and conclusions of second homes background paper - that it would not be appropriate for Plan to impose a residence policy.

#### Town and Parish Councils

- Some support for this as a policy approach.
- Dorset Council should address the issue of second homes and with reference to new houses the Plan should consider a principal residence policy.
- Dorset Council policy to ensure new build must go to full time living households or who work locally, whether as tenants or owners. Qualifications to be protected by covenant.
- Support for ensuring reasonable amount of homes left for those with local connection.
- The Dorset Council Local Plan should apply the second homes policy already put forward in the Purbeck Local Plan. This could be applied to all AONB parishes with high percentage of second homes and that desire such a policy.
- Safeguards should be put in place – by condition or legal agreement - to ensure new housing remains as a 'principal dwelling'.
- Examine the St Ives model.
- Not obvious how this might be achieved.
- A policy of 'Rural Exception Sites' dedicated to providing only 'low cost' housing would accommodate local families in areas of high demand for second homes.
- Use of planning condition to secure.

#### Public response

- Second home policy will deter developers.
- Principal residence approach seems too uncertain to be viable - may have negative local impacts.
- A limit to the number of "second home" purchases, as this contributes to the insufficient housing in Dorset.
- Applying limitations on the occupation of new homes may displace demand for 'second homes' to other areas/villages.
- Existing dwellings should ideally only be sold on as principal residences.
- A principal residence policy would only apply to new builds.

## Paragraph 4.7.6 - Enforcement

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### Public response

- Enforcement could be used but would no more than other enforcement.
- Enforcement needs to be much tougher.

## 9.5. Neighbourhood Plan

### Paragraph 4.7.7 - Neighbourhood Plan

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#### Dorset AONB

- Support from restrictions through neighbourhood plans though this could result in a less consistent outcome than a principal residence policy.

#### Town and Parish Councils

- The issues should be addressed in neighbourhood plans.
- Suggestion that the issue has been successfully challenged through Neighbourhood Plans in Cornwall and Devon.
- In the absence of a Neighbourhood Plan the Dorset Local Plan must provide clear policy guidelines for new house building to mitigate the negative impacts of high pockets of second home ownership.
- A monitoring project has been established on second homes as part of the Bridport Area Neighbourhood Plan – which could be reflected in the Local Plan.
- Leaving to neighbourhood plan would be too difficult due to evidence required to be produced by volunteers and timescales.

#### Bridport Local Area Partnership

- At the very least the Local Plan should state its support for second home policies where these are included in neighbourhood plans. (With reference to paragraph 4.7.8).

#### Bridport Area Neighbourhood Plan Joint Councils Committee

- Explored in BANP process - concluded that there was insufficient local evidence to sustain such a policy at the time. Monitoring project has been established to consider all aspects in a future BANP review and a similar Local Plan approach could be adopted.

#### Wyatt Homes

- Note that the DCLP consultation document anticipates (correctly in our view) that there would be challenges with introducing a 'principal residence policy', even if this were confined to the areas of highest second home ownership. The issue should be left to neighbourhood plans in areas where this issue is causing the greatest harm.

#### Public response

- Neighbourhood plans take too long to be responsive.
- The suggestion to tackle the problem through neighbourhood plans is not necessarily viable - Inspectors demand proof of any harm caused by a restrictive policy, which may be beyond the facilities of a neighbourhood plan group.
- The possibility of introducing a 'principal residence policy' should be left to neighbourhood plans in areas where this issue is causing the greatest harm.



- The principal residence policy has been included in the approved St Ives Neighbourhood Plan and tested through the High Court. This could be applied to the Dorset Council area and would ensure that every new house built met a need for a full time home.

## 9.6. Other means

### Taxation

#### Town and Parish Councils

- Higher council tax for second homes.
- A high charge should be set on unoccupied homes instead of restricting second home ownership - which is counter-productive and unenforceable.
- Do not discount council tax on second homes. Full council tax rates must apply.
- With existing housing stock, the Council should consider a form of levy or tax regime for owners of second homes in order assist with the community cohesion.

#### Bridport Area Neighbourhood Plan Joint Councils Committee

- Consider Council Tax adjustments, if appropriate, but can this also be extended to existing second homes for continuity.

#### Dorset Climate Action Network

- Consider imposing high council tax rates on second homes - yield from this tax might be used partly to cover the cost of tracking and checking the second homes and could also be used in subsidising or directly funding the provision of affordable housing in those communities with highest numbers of second homes.

#### Public response

- A lot of support for managing through Council Tax. Not possible to ban people wanting a second home and increasing council tax would generate income. Funds could be used to support affordable housing, environmentally friendly construction etc.
- Additional council tax for second homeowners but ensure that it cannot be bypassed by different partners claiming different primary residences. Council tax should also go to the local parishes not the 'Dorset pocket'.
- The percentage of second homes could be reduced by charging a second home Council Tax levy, which would need to be phased in over several years to avoid significant disruption to existing second homeowners and potential turmoil in the local housing market.
- Second homes should pay double/ten times council tax.
- Support for local annual tax on value of second homes.
- There is a difference between outsiders having a second home and locals - this difference should be reflected in the tax system.
- Owners are registering houses as businesses and paying nothing under rural business rate relief.
- Should not allow holiday lets to be empty – high taxes for properties left empty for prolonged periods could mitigate this.
- Financial penalties would be unlikely to deter Second Homeowners.
- Pay additional charge to subsidise shop, school and services unable to afford to run outside of peak times.
- Higher taxation could be used to defer such major seasonal variations instead.

- New housing could be limited in areas with a high density of second homes, such as the Heritage Coast, to limit their spread and to reduce the gradual environmental erosion of such areas.
- Second homes are now used for financial gain and clauses should be tightened to ensure that there cannot be an overwhelming amount of financial gain made on properties without taxation. Councils have this power already and it should therefore be more strongly enforced through the Local Plan.
- Use of Council Tax could be useful but overall, the situation requires more in-depth assessment with a provision to allow changes to be made in the future.
- Concern with second homes - suggestion to add VAT to purchase of second homes.
- Second homeowners should not be permitted to exploit a tax loop-hole / concession arising from registering their home as 'holiday accommodation'.
- Increase taxes and require the homes to be occupied for 6 months of the year.

## Legislation

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### Town and Parish Councils

- Legislative measures.
- Lobby Government to limit second homes in areas with housing shortages.

### Public response

- Second homes are not a matter for the local plan but national policies relating to stamp duty and council tax.
- Central government should tighten legislation to stop holiday homes being used as businesses whilst avoiding tax legislation.
- Council should explore options to legally restrict/limit occupation of new homes to those who live locally/are employed in the local area.
- Central government should individually delegate second home policies to councils.
- A national debate on this issue could be better.

## Other approaches

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### Town and Parish Councils

- There should be an agreed methodology where a community can identify concerns about the level of second home ownership in a way which allows an equitable solution to manage the impact.

### Weymouth Civic Society (Planning and Environment Committee)

- Further investigation of measures to deter second home ownership in areas vulnerable.

### Public response

- The Council will need to consider other mechanisms for addressing second homes in the existing housing stock.
- All new builds should come with a covenant that they must not be second homes.
- Shared ownership schemes, such as Community Land Trusts.
- Consider how to incentivise locals to buy or rent in their area, shared ownership, a points system or other ways to de-incentivise second home ownership should be a priority.
- Councils should work together across the country to come up with an issue.
- Encourage second homeowners to rent to local people rather than renting as holiday lets.
- New developments should not be sold as second homes for a set time period.

- Potentially there could be a cap on the number of second homes allowed on residential estates to reduce ghost towns and impact on local regions. Commercial charges also need to be tighter on second residences as many are used for monetary value including villas to rent etc. which ties in with the policy on second home ownership which too must be tighter.
- Suggestion that some developments could be built specifically for the second home market.
- Only allowing redundant buildings to be converted into second homes outside of the main towns and villages.
- Should be a specific limit to second homes in the area.
- Extend and apply the Housing Act which curtails purchase of ex-council/magna houses by second-homers - could lead to increase in hotels, BnB, mobile home options for tourists and thereby increase revenue from tourist industry.
- Council houses sold off must also go to full time living households.
- Disallow conversion of single properties into multiple flats which seems to feed the second home market in certain areas.
- Second homes are not being controlled enough due to the landowners holding levying power.
- Dorset Council should look into ways of dealing with second homes as established in other parts of the country.
- There should be an immediate review into unused housing across Dorset, with the view to reclaim and renovate these spaces.
- Suggestion of exploring a method of rationing to prevent future increases in the areas where there is a real issue - requiring permission for change of use to a second home.
- Suggestion of an annual check for proper maintenance.
- More need to be done about the loss of viable housing to converting to houses of multiple occupation (HMO), conversion to furnished holiday lettings.

## 9.7. Free market

### Support for free market

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#### Town and Parish Councils

- Desire not to preclude buy to let - which may meet a housing need, nor deprive homeowners of holiday let income.

#### Public response

- Second homes should be welcomed/encouraged.
- Second homes should be left to the open market to determine.
- Interfering in housing market is unlawful.
- It is not possible to limit who buys existing housing stock in open market economy.
- In a free market economy, you can't control the second home issue - suggestion to build homes that are not attractive as second homes.
- It is not illegal to own a second home.

## 10. Policy HOUS7: Isolated homes in the countryside

### 10.1. Approach

#### Approach

##### Cranborne Chase AONB Team

- Seems to provide a route to those with significant resources to create unsustainable dwellings over large areas of the countryside – would prefer this item to be omitted.

##### Developers/Landowners/Agents

- Isolated homes in the countryside are supported.
- Agreement with suggested approach and wording.

##### Town and Parish Councils

- Support the current approach.
- There should be a presumption in favour of rural workers.
- Isolated homes in the countryside should not be permitted in the AONB/SSSI/Heritage Coast.
- Currently being abused - no check on viable business plans or temporary nature of residences.
- Should have additional tier for approval of isolated homes.
- Notify all neighbourhood to comment on app.
- Enforce compliance with policy.
- Ensure covenant/planning condition preventing house being sold off separately.

##### Neighbourhood Plan Groups

- Agree with approach given the limited number of cases that may arise.
- Should be a presumption in favour of rural workers.

##### Public response

- Agree/support with approach.
- More homes needed in the countryside.
- Concerned that the policy could encourage the provision of homes in unsustainable locations.
- Some general disagreement with housing development in the countryside.
- Only applies to those wealthy enough to be able to fulfil these criteria.
- More likely to be self or custom build and at present there are insufficient opportunities for these outside of development boundaries.
- Lyme Regis has no sites where this could work, can this be looked at differently?
- Seems to apply to opposite ends of economic spectrum – the rich at one end and rural workers needing housing provided by employer. What about everything in between?
- Doesn't provide adequate services or infrastructure and damages countryside.

#### Paragraph 4.8.1 - Countryside setting

##### Local Group (Non-statutory)

- Whilst we accept parts II and III of this policy, we cannot otherwise see how the development of new, isolated dwellings in open countryside “improves the countryside setting”. Part I of this

policy is an invitation to inappropriate development, that contradicts other plan policies such as ENV 4 on landscape protection.

## Definitions of terms

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### Town and Parish Councils

- Need clearer definition of 'home'.
- Clarification needed as to the type of development the policy applies to – e.g. new building / redevelopment or conversion/extension of an existing building.
- 'Innovative design' could mean developments out of keeping with the local character - this needs clarifying.
- Concern with the term 'materially larger' in relation to replacement building or extensions – is imprecise, possibly deliberately so but this can become a matter of opinion.
- Suggestion to define developments that are a certain percentage above the floor area of the original building or in the case of extensions above existing floor area.

### Dorset Wildlife Trust

- 'Rural workers' can include those working on nature-based enterprises.

## Design

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### Town and Parish Councils

- Style of new buildings should be in keeping with the existing buildings.
- Modern builds should not be in isolated rural locations, AONB or conservation areas.

## 10.2. Policy

### Policy

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#### Town and Parish Councils

- Extending existing buildings - policy has to be cognizant of what would be permitted under the General Permitted Development Orders (GPDO).
- It is unclear whether all criteria must be met – needs clarifying, currently ambiguous.

#### Developers/Landowners/Agents

- Should cross refer to the supporting text to Policy DEV8.
- Policy approach described at paragraph 2.6.22 is too restrictive and not actually consistent with other policies in the draft Plan, not consistent with the paragraph 79 (NPPF19).

### Criteria I

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#### Historic England

- Support HOUS7, especially Criterion I. Cross-refer to ENV5.

#### Town and Parish Councils

- Clause I list should be "and" conditions.
- Oppose wording 'innovative', alternatively include 'only housing which are environmentally zero carbon and contributing towards tackling climate change'.

### Public response

- Clauses should be 'and'.
- Supports 'particular regard to minimising its impact'.
- Too open to interpretation, green belt should be undeveloped except for more exceptional reasons for agriculture.
- Unsuitable to allow exceptional quality/design to override impact on countryside as this is too subjective.
- Disagree, especially with the concept of allowing something of exceptional design to be built.
- Will enable large and expensive houses when there is a need for small properties of suitably high sustainability and visual quality.
- Totally disagree especially with the concept of allowing something of exceptional design to be built – these are weasel words to allow the uber rich to intrude on tranquil Britain.
- Innovative housing should only be given planning permission where the building materials embody zero carbon emissions, and the property will have zero carbon emissions in use.
- Net zero standards will eventually not be considered exceptional or innovative.

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## Criteria II

### Town and Parish Councils

- Clause II list should be “and” conditions.

### Public response

- Enterprises needing housing for their workers on or by their workplace in the countryside need to satisfy Reading's tests etc but any rural worker working anywhere?
- Wording is too flexible, should there be a reference to proof of viability of business?
- Business should be proven that it would last for several years.
- No building in the countryside should be permitted unless for agricultural labourers in perpetuity.

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## Criterion III

### Town and Parish Councils

- Clause III - concern that DEV7 covers re-use of existing buildings and that there may be conflict with paragraph 4.8.3 where the 'same use' is required and policy HOUS7.III – needs clarification.

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## Additional criterion

### Dorset Wildlife Trust

- Suggest encouraging wording in the policy to reflect policy ENV3 to support the primary purpose of to conserve or enhance biodiversity and deliver a net gain.

### Town and Parish Councils

- Use of basements and roof space need to be considered as these elements can increase living space without altering the external appearance of the property.

### Developers/Landowners/Agents

- Possible improvement to this policy would be to add a fourth bullet under HOUS7(I) to cover the redevelopment of previously developed sites (including former agricultural buildings) - could be

caveated further by requiring support in an emerging neighbourhood plan, for example for “outlying sites”.

#### Public response

- Add a fourth bullet point under HOUS7(I) to cover the redevelopment of previously developed sites (including former agricultural buildings).

## 11. Policy HOUS8: Occupational Dwellings

### 11.1. Approach

#### Approach

##### Town and Parish Councils

- Supported.
- Not in AONB.
- Support subject to design criteria.

##### Developers/Landowners/Agents

- Supported including new temporary dwellings for workers in agriculture.
- Agree with suggested approach and wording.

#### Public response

- Support/agree with approach.
- Too prescriptive.

#### Occupational dwellings in the green belt

##### Town and Parish Councils

- Supported but not in greenbelt.
- Policy statement in paragraph 4.9.3 leads to suggest that occupational dwellings would not be permitted which is in partial conflict with paragraph 4.9.2.
- Paragraph 4.9.3 could be strengthened - Very special circumstances could theoretically be presented which could conflict with paragraph 4.9.5 but would not be in conflict with the NPPF.

#### Public response

- Not in green belt.

#### Financial test

##### The Charborough Estate

- Paragraph 4.9.7 - greater clarity is needed about what is meant by ‘financially sound’.

##### Town and Parish Councils

- Support for the principle of applying a financial test (para 4.9.7), but the first bullet point could preclude new enterprises being developed or existing enterprises being expanded, as they will not have been ‘established for a continuous period of at least the previous three years’.

## Temporary agricultural workers' dwelling

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### Dorset Wildlife Trust

- 'Rural workers' can include those working on nature-based enterprises.
- Paragraph 4.9.11 - A temporary forestry worker dwelling could offer great potential for restoration of overstood coppice.

### The Charborough Estate

- Paragraph 4.9.11 - why temporary dwellings for agricultural workers allowed, but not for workers in forestry or other rural businesses.

### Town and Parish Councils

- Paragraph 4.9.11 - Temporary occupational dwelling rules should apply to occupations other than strictly agricultural e.g., forestry should not be precluded from temporary occupational dwellings.

## Removal of occupancy condition

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### Public response

- Paragraph 4.9.13 & 14 seems to be in contradiction with 4.9.1-12 - no reason for building to be in green belt once the enterprise ceases to exist.
- Minimum length of time before being able to apply to lift occupancy restrictions.

## Definition – 'other rural business'

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### Town and Parish Councils

- Definition is required as to what qualifies within this section as "other rural business".

## Enforcement

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### Town and Parish Councils

- Caution is necessary as occupational houses have been turned into private dwellings through market forces and in areas that normally development would not be permitted.
- Need to prevent erection of barns then conversion to residential a short time later.
- Loop hole being abused - no check on business plans and no check on temporary nature of dwellings.
- Occupancy condition can be removed within few years, a financial test is needed to be stringently applied to prevent this.

### Public response

- Homes will be sold on to private buyers, can this be conditioned so the homes are sold on as affordable or rentals.
- Restrict use to local worker.



## 11.2. Policy

### Criterion I-IV

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#### The Charborough Estate

- Criterion II and supporting text (paragraph 4.9.7) - greater clarity is needed about what is meant by 'financially sound'.
- Criterion III - not clear what is meant by "minimum size and an appropriate design commensurate with the established functional requirement and reflective of the enterprise's financial projections".
- Criterion V – delete 'new' to enable temporary dwellings to support existing farming activity also.

#### Public response

- Unsure about viability part - often wages for this type of thing will not be high.

### Criterion VIII-X

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#### The Charborough Estate

- Criterion VIII - amend to give a degree of flexibility about the period of time required to advertise / market an occupational dwelling. It should be re-worded to read "VIII. a suitable sustained attempt has been made to advertise and market the occupational dwelling for a continuous period of at least twelve months unless specific circumstances clearly indicate that marketing is not necessary".

#### Town and Parish Councils

- Criteria IX and X - need a time frame.

#### Public response

- Delete VIII, XI, XII - open to abuse.

### Additional criterion

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#### Cranborne Chase AONB Team

- Should include reference to the Position Statement on Housing in the AONB.

#### Town and Parish Councils

- Exceptions should be made for off-grid and eco homes.

#### Public response

- Need to mention minimum threshold or housing standard in terms of safe and healthy living.
- It may be needed for start up business, charitable trusts, social enterprises which might take more than 3 years to produce a profit.
- Pressure on road network with greater use of private cars.
- need to mention minimum threshold or housing standard in.

## 12. Policy HOUSg: Other residential development outside development boundaries

### 12.1. Approach

#### Approach

##### Historic England

- Support.

##### Town and Parish Councils

- Support.

##### Ken Parke Planning Consultants Limited on behalf of Mr & Mrs Wellman

- The existing agricultural buildings also offer potential for redevelopment or conversion for residential, tourist or for business uses.

##### Public response

- Agree/support.
- No building should take place outside of existing boundaries.
- Delete clause that enables those wealthy enough to build.
- Results in houses for second homes.
- Villages need to grow to maintain vitality. Allow an increase in new housing limited to a percentage of the total house numbers in the area, over a set period of time, a percentage of new houses to be sold only to local workers and perhaps a percentage of new houses that could be sold as 2nd homes (perhaps zero).

#### Replacement buildings, extensions and ancillary domestic buildings

##### Town and Parish Councils

- Paragraph 4.10.3 would appear to be in conflict with extensions which could be permitted under GPDO – suggestion of alternative wording to clarify.
- Clarification would also be useful if someone wants to knock one house down and build 3 - would that be allowed?
- Problems with single houses being demolished and two or more properties being built on same site.
- Why limit replacement dwellings to only 50% bigger than original? Bigger replacements in some cases could be an improvement.
- Paragraph 4.10.5 appears to be in conflict with paragraph 4.10.3 - Which would take priority the foot print policy or the 50% GIA policy?

##### Cranborne Chase AONB Team

- Suggested reference to the Position Statement on Housing in the AONB, which contains size criteria for replacements.

### Public response

- Design standards must be high quality to minimise impact on environment and contribute towards tackling climate and ecological emergencies, particularly to minimise the risk of flooding; i.e. where carbon neutral this should be looked at more favourably and encouraged.

## Small-scale extensions to residential gardens

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### East Dorset Environment Partnership

- Paragraph 4.10.11 – 4.10.13 - welcome this proposal to reduce the adverse impact of non-native planting in rural areas - should be greater control of damaging invasive species commonly used for hedging and screening.

### Cranborne Chase AONB Team

- Suggested reference to the Position Statement on Housing in the AONB, which contains size criteria for extensions.

### Town and Parish Councils

- Should restrict to one extension only.
- Query what is the reasoning behind the blanket statement of not developing on or extending garden space.

### Public response

- Native species may not be appropriate to the location or changing climate.
- Paragraph 4.10.11-13 - too prescriptive as extending a garden would not be detrimental to the countryside or nearby properties.
- Paragraph 4:10:13 - require local connection and primary residence would be supported.

## The subdivision of existing dwellings

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### Public response

- More clarity needed on how large homes can be sub-divided.
- Paragraph 4.10.14 - restrictions strange when proposing so many homes.

## Low-impact dwellings

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### Town and Parish Councils

- Low impact dwellings etc. – this is not fully justified in the text.

## Holiday lets

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### Public response

- Presume that holiday let conversions of barns will be okay but limited to 10 months a year.

## 12.2. Policy

### Criterion III

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### Town and Parish Councils

- iii, ancillary residential accommodation in exceptional circumstances only, is welcomed.

### Public response

- III – Disagree - any ancillary domestic building should be supported for immediate family use.
- Disallow garages and shed conversions converting to residential.

## Additional criterion

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### Historic England

- Should also ensure that other residential development outside development boundaries would not affect heritage assets. After 'local character' add: 'including the significance of heritage assets and their settings'. Refer to ENV5.

### Town and Parish Councils

- Include clause restricting to a maximum increase of 50%.

### Public response

- Include a condition that any domestic building cannot be let as a separate building.
- Suggests a criteria based policy that allows for proportional growth around a village for local workers, restricting second homes.
- The policy should include a safeguard against the construction of a building the use of which is ancillary to the replacement dwelling such as a garage or garden building.
- Self and custom built housing should be permitted outside DDBs where it provides a high level of sustainability and passive energy efficiency.
- Consider need for small buildings for home workers and microbusinesses and 'granny flat' to provide care for family following covid.

## 13. Gypsies, Travellers and Travelling Showpeople

### 13.1. Introduction

#### Paragraphs 4.11.1-3

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##### Town and Parish Councils

- Paragraph 4.11.2 - Using the single term 'Travellers' for both Gypsies, Travellers and Travelling Showpeople will be problematic due to the differing status these groups have in law.

##### Public response

- Respondent considers that policy allocations for Traveller sites should be presented in a separate planning policy document.

## 14. Policy HOUS10: The need for Traveller sites in Dorset

### 14.1. Approach

#### Agreement with the approach

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##### Town and Parish Councils

- Respondent considers that more Traveller sites are needed in Western Dorset.

- Respondent considers that there is a need for further Traveller sites and notes that some existing Traveller sites may not be suitable.

### Community groups (non-statutory)

- Respondent considers that empirical evidence suggests that there is a demand for Traveller sites in Bournemouth, Christchurch and Poole council area.

### Public response

- Respondent acknowledges the importance of pitches and facilities for Travellers and other itinerant people and their families.
- Respondent considers that Gypsies and Travellers need places where they can stay that support their lifestyle.

## Disagreement with the approach

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### Ferndown & Uddens Business Improvement District

- Objection to the policy - includes provision for 31 pitches for 'Travellers who are excluded from the planning definition'. It believes that provision should be made for Gypsy's and Travellers included within the planning definition only.
- Objects to the consideration of need in any other way than for the functional area as a whole.
- Empirical evidence of unauthorised traveller encampment suggests that the demand for such sites are within the core of the conurbation.

### Public response

- Respondent queries whether there is a need for Traveller sites both for those people who satisfy the requirements in the planning definition and those that do not.
- Respondent queries whether there is a specific need for a Traveller site in Weymouth.
- Respondent does not consider that there is a need for permanent Traveller sites in Dorset Council area as the assessed need has not been based on 'historic demand' or 'proven future need', and because they consider that Traveller communities tend to be housed in dwellings for most of the year and limit their travelling to the summer months.

## Paragraphs 4.11.5 - 4.11.10 - Evidence

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### Town and Parish Councils

- Paragraph 4.11.6 states that the Council does not consider that further transit pitches need to be provided in the Dorset Council area yet at paragraph 4.11.9 it is stated that there is a need for around 25.
- At 4.11.9 it is stated that there is a need for 31 pitches for Gypsies and Travellers, as defined in planning policy yet at 4.11.16 the proposed allocation is 57.
- There appears to be unexplained discrepancies. It is not clear whether the 'need' takes into account existing sites or whether the stated need is for additional sites.

### Community groups (non-statutory)

- Respondent notes that the council has presented details of the needs assessment in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.

### Ferndown & Uddens Business Improvement District

- Gypsy and Traveller Accommodation Assessment (GTAA) undertaken in 2017 cannot be interrogated as it is not included in the plans evidence base.

If the figures from the 2017 assessment of need are to be used they should follow the same approach concluded in the East Dorset Local plan consultation 2018 that the assessment did not require the inclusion of the Blunts Farm site.

- Failure to provide any evidence supporting policies HOUS10 and 12 indicates an over simplistic reliance on the first draft East Dorset Plan proposal before it was assessed and rejected in 2018.

### Developers/Landowners/Agents

- Respondent notes that the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment was dated 2017, and that the evidence presented in this document may no longer be up to date. Respondent considers that preparing a strategy on the basis of this evidence could be unsound.

### Public response

- Respondent does not consider that the council has clearly justified its strategy with supporting evidence referred to in national policy ‘Planning policy for traveller sites’.

## 14.2. Policy

### Policy approach

#### Public response

- Respondent queries how provision of Traveller sites through the proposed allocations reflects/matches the changing demand.

### Criterion I.

#### Public response

- Respondent suggests that the first sentence of Policy HOUS10 should be re-drafted to state ‘up to ... pitches’ rather than ‘at least ... pitches’ as the need for Traveller sites has not been proven.

### First bullet point - pitches for Gypsies and Travellers

#### Businesses

- Concern that the statement of requirement for 20 pitches contradicts another part of the plan which states many more pitches.

#### Public response

- Respondent notes that the stated need for 20 pitches for Gypsies and Travellers in Policy HOUS10 is inconsistent with paragraph 4.11.16 which indicates that the proposed allocations identified in the local plan have capacity to deliver around 57 pitches.

## 14.3. Meeting the need for Traveller accommodation

### Paragraphs 4.11.11 - 4.11.16

#### Town and Parish Councils

- Respondent supports the policy response/strategy in respect to Traveller sites.

- Respondent advises that some town and parish councils have not consulted their local communities on Traveller sites.
- Respondent considers that it is important to make policy allocations which support delivery of permanent Traveller sites, which in turn allow Travellers to access services and facilities (including schools and medical care).
- Respondent considers that the council should review its strategy for selecting Traveller sites and consider sites/areas which are more closely located to existing settlements, services and facilities.
- Respondent emphasises the importance of a positively prepared strategy to meet Travellers needs alongside other strategies in the local plan.
- Respondent notes that the capacity of allocated sites for Travellers who satisfy the planning definition exceeds the need identified in the Gypsy and Traveller Accommodation Assessment.
- Query the justification for the level of over allocation of sites to meet the need.
- It is unclear from the policy whether the planned number of pitches are allocated across a single site or multiple sites.
- Suggestion there should be provision of small temporary sites on short 2-3 week leases.
- Recommend provision of small ( One family) sites on derelict or defunct highways land on short term leases, along with sanitary infrastructure.
- No mention of the existing G&T site south of the A30 - please provide clarity on future plans.
- Here 'assimilation' probably is important (in the sense of the assimilation of different types of travellers).
- Concern with Travellers located at the layby on the A30 near Nyland - need to find a permanent solution to accommodate them.

### **Bournemouth, Christchurch, and Poole Council**

- Welcome commitment to joint working on planning for the needs of Gypsy and Travellers.

### **Ferndown & Uddens Business Improvement District**

- Recognised that these sites are difficult to allocate but it is the BID's view that they should be considered strategically through a properly constituted study involving the main urban areas.
- When considering the suitability of such sites the BID believes that the criteria included in 4.11.11. should also include the necessity "not to threaten the desired outcomes of strategic objectives through the development of allocated sites."
- Consideration and assessment of allocations in the Green Belt needed to make up for losses as a result of the allocation of Gypsy and Traveller sites elsewhere as the case with employment proposal FERN10: Land west and south of Longham Roundabouts.
- Highlights inconsistency at paragraph 4.11.16 and policy HOUS10 in relation to need for 20 pitches for Gypsy and Travellers.

### **Community groups (non-statutory)**

- Respondent suggests that the council should also take account of other 'strategic objectives' when considering proposed allocations relating to Traveller sites (the respondent's comments specifically reference paragraph 4.11.11 and the proposed Blunts Farm [GT/WIMI/002] allocation).
- Respondent considers that the council should consider changes to Green Belt boundaries, releasing land for Traveller sites, to make up for allocation of Traveller sites elsewhere.
- Belief that housing needs of Gypsies, Travellers and Show people should be prioritised over those of the settled population.

### Developers/Landowners/Agents

- Support the council's strategy and approach to meeting the Traveller communities' needs.
- Support the council's approach of meeting needs through specific allocations (in appropriate locations which meet this community's needs), rather than as a component of the site allocations policies for homes elsewhere in the local plan.

### Public response

- Respondent considers that the policies relating to Travellers should be more clearly presented in the local plan.
- Respondent does not support proposed Traveller sites in the Area of Outstanding Natural Beauty, locally important landscape or other land with local amenity value.
- Respondent considers that the council should engage with local people when considering allocations for Travellers.
- Respondent suggests that the council should not consider Traveller allocations around Swanage because of its remote location. (Respondent considers that Traveller allocations in this area would be used as holiday accommodation).
- Respondent suggests that the council should explore whether Traveller sites could be delivered on brownfield land.
- Respondent suggests that the council should consider infrastructure provision (availability and capacity of existing infrastructure) when preparing its development strategy.
- Respondent suggests that the council should seek to expand or intensify existing Traveller sites before considering allocations for new sites through the local plan.
- Respondent states that the local plan must ensure that there are adequate sites to meet the needs for further pitches and plots in Dorset Council area, and each proposed site should be assessed on its merits.
- Respondent hopes/suggests that the council should engage with Traveller communities to properly understand their needs.
- Respondent suggests that the council should seek to meet Traveller needs on existing caravan sites rather than through additional policy allocations.
- Respondent suggests that Traveller sites should be delivered within each functional area.
- Respondent does not consider that there is evidence to justify the proposed 3 Traveller sites in the Shaftesbury and Gillingham areas.

## 15. Policy HOUS12: Gypsy, Travellers and Travelling Showpeople site allocations

### 15.1. Approach

#### Town and Parish Councils

- Respondent has concerns that some of the proposed Traveller sites are in remote areas.
- Concern that the policies don't appear to have any restriction as to what accommodation will be permitted on a single pitch - Sites and pitches can become overcrowded if there are no controls on pitch occupancy.
- Suggestion that the way sites are used differ between Travellers and Travelling Showpeople where the latter need a larger area for the storage of their equipment but minimal residential land use. This aspect does not seem to be considered in detail.



- Respondent expresses concern about an existing unauthorised Traveller site and the need to find an alternative more suitable site.

### Historic England

- Considers that the council should provide further information to clarify how it has taken account of/assessed the potential impacts of Traveller sites on heritage assets.

### Environment Agency

- Suggests that to avoid pollution to the environment, appropriate foul drainage and waste management infrastructure should be delivered to ensure that the environment is not polluted.

### Wessex Water

- Residential and other regularly occupied/sensitive development should not be permitted in locations likely to be adversely affected by the operation of sewage treatment, sewage pumping and other water treatment or supply infrastructure.
- A number of the proposed sites are crossed by Wessex Water underground assets. Easements must be observed and this may affect site layout and number of units which can be accommodated on site. The affected sites are:
  - Piddlehinton Camp (GT/PIWL/004);
  - Land at Enmore Green (GT/SHAF/004); and
  - Higher South Buckland Farm (GT/WEYM/004).

### Environmental groups (non-statutory)

- Suggestion that sites require full assessment against biodiversity impacts prior to allocation.

### Businesses

- The geographical spread of the allocated sites should be extended, particularly to the eastern edge of the Plan area, to ensure a convenient choice of locations for traversing Dorset.

### Public response

- Respondent considers that the council should provide further details of the costs and revenue related to delivery and management of council run Traveller sites, and that it is important to identify a 'return' on this investment.
- Respondent does not consider that the proposed Traveller allocations have been justified.
- Respondent considers that the proposed Traveller allocations will 'blight' neighbouring land use leading to a fall in land values.
- Respondent considers that the council should consider whether there are opportunities to deliver further Traveller sites in the eastern part of Dorset.
- Respondent queries whether the council can objectively consider applications for Traveller sites on council owned land.

## 15.2. Policy

### Criterion V

#### Town and Parish Councils

- Respondent considers that the council should expand the remit of Clause V. of Policy HOUS12 to include a requirement to consider impacts of proposed Traveller sites on employment uses, tourism and transport.

### Natural England

- Suggests that the first bullet point of Part V. of Policy HOUS12 should be amended so that it cross references policies ENV2 and ENV3.

### Historic England

- Considers that the council should provide further information to clarify how it has taken account of/assessed the potential impacts of Traveller sites on heritage assets.
- Historic England suggest that the council should add a further bullet point to part V of Policy HOUS12 requiring assessment of the impacts of development on heritage assets.

### Environmental groups (non-statutory)

- Respondent suggests a revision to the first bullet point of Part V. of Policy HOUS12 as follows: 'any impact resulting from the proposal on the character and value of the landscape, **priority habitats** or **and** the settlements adjacent to the site can be avoided or adequately mitigated; and'.

## 15.3. Figure 4.5 and Appendix 4 - Comments in respect of the proposed site allocations

### Wintergreen, Beaminster - GT/BEAM/001

#### Dorset AONB Team

- The ongoing use of this small-scale existing (but unauthorised) site is not considered to result in significant effects on the AONB.

#### Public response

- In reference to the proposed Traveller allocation at Wintergreen Beaminster (GT/BEAM/001), respondents:
  - consider that a permanent pitch and allocation would have an adverse impact on the local environment;
  - consider that the site is remote from local services and facilities;
  - consider that the access into and from the site is poor;
  - note the site is within the Area of Outstanding Natural Beauty, close to the junction of several rights of way and within the watershed of the River Brit;
  - note that the site is established and does not generate any issues;
  - call for the proposed allocation to be removed from the local plan.

### Thornicombe - GT/BLFO/001

#### Public response

- In reference to the proposed Traveller allocation at Thornicombe (GT/BLFO/001), respondents:
  - note that the proposed site allocation is located in the flood plain.
  - consider that it would not be possible to form a safe access into or from the site.
  - do not consider that the existing site should be enlarged.

## Land North of Woodhouse Cross, Gillingham – GT/GILL/001

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### Gillingham Town Council

- The allocation sites for Gillingham are inappropriate. There is a nearby site on the B3092, the road to Mere, within the Wiltshire boundary. Dorset Council should liaise with Wiltshire Council in this instance and share these sites.

## Plant World, Gillingham - GT/GILL/002

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### Gillingham Town Council

- Inconsistency between the proposed allocation and the conclusion that the site is 'unsuitable' within the SHLAA produced in 2019.
- The allocation of this site is contrary to the principles set out in para 4.11.14. This site should be excluded.
- The justification is unclear e.g. where is the need defined for this facility in Dorset in general and in the Gillingham area in particular.
- Query whether there will be a need for additional facilities to accommodate the allocation.
- It is felt that many of the proposed sites, and in particular the site at Milton-on-Stour are located in village areas, but do not have adequate facilities and would not fit within policy HOUS13 para V and should be reconsidered.
- It is not clear whether Gypsies, Travellers, or Travelling Showpeople would occupy the site.
- The allocation sites for Gillingham are inappropriate. There is a nearby site on the B3092, the road to Mere, within the Wiltshire boundary. Dorset Council should liaise with Wiltshire Council in this instance and share these sites.

### Mere Town Council

- Object to the proposed Traveller allocation at 'Plant World' because of its proximity to an existing Traveller site in Mere.

### Bourton Parish Council

- Object to Plant World as a Traveller site - it is a thriving garden centre.

### North Dorset CPRE

- Unlikely that the owner would accept a Traveller site and unlikely that DC could afford to buy the site.

### Developers/Landowners/Agents

- Respondent notes that the proposed allocation of 'Plant World' (GT/GILL/002) as a Traveller site is inconsistent with the assessments undertaken for the land availability assessment (reference LA/GILL/006, LA/GILL/007 and LA/GILL/008).

### Public response

- In reference to the proposed Traveller allocation at Plant World (GT/GILL/002), respondents:
  - confirm that the site is not available for use by Travellers;
  - query whether connections could be successfully formed between pitches on the site and utilities/services;
  - consider that the proposed allocation could adversely affect the setting of Milton on Stour Conservation Area, and erode the separation between this conservation area and the Gillingham Conservation Area;

- consider that the proposed allocation could adversely affect the character of the village;
- note that there are other suitable existing sites for Travellers in the immediate area;
- object to proposed allocation on the basis that the existing use (garden centre) is a community facility and local employer;
- note there is no capacity in the local school to accommodate further pupils;
- note that there is no drainage capacity in the village;
- note that local roads around the proposed allocation site are congested;
- note that the site has previously been considered and discounted for allocation and use as a site for Travellers;
- consider that the proposed allocation would have an adverse impact on landscape character;
- note that the proposed allocation is located outside the settlement boundary defined in the neighbourhood plan and is not consistent with neighbourhood plan policy.

### Land at Pleck - GT/HAZE/003

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#### Public response

- In reference to the proposed Traveller allocation at Pleck (GT/HAZE/003), respondents:
  - Suggests that the site is allocated for employment use in the Neighbourhood Plan – Traveller use would conflict with this.
  - consider that the proposed use is incompatible with neighbouring uses (use of the adjacent 'chicken sheds' gives rise to noise and pollution);
  - note that the site is previously been considered for allocation as a Traveller site and was rejected;
  - do not consider that the site can be safely accessed;
  - note that the proposed allocation has not been referenced in the Hazelbury Bryan neighbourhood plan.
  - Consider that Clarification required as to whether the site would be used by Gypsies and Travellers, or Travelling Showpeople – the plan contradicts itself on this.
  - Consider that the site not suitable for dwellings - houses telephone mast, adjacent to solar farm and electricity substation;
  - Consider it difficult to achieve safe access - entry from sunken lane on bend, poor visibility on a hill; phone mast would prevent demolition of existing buildings; main building recently reroofed and used by local businesses who would be impacted.

### Land at Military Lane, Kingston Russell - GT/KIRU/001

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#### Hazelbury Bryan Parish Council

- Proposed allocation appears to be contrary to Hazelbury Bryan NP Policy HB4 (key rural views).

#### Public response

- In reference to the proposed Traveller site allocation at Military Lane (GT/KIRU/001), respondent:
  - notes that the proposed allocation could be inconsistent with made neighbourhood plan policy;
  - does not consider that a suitable access could be formed into the proposed site;
  - considers that the proposed allocation would harm services; and
  - considers that the land should be reserved for employment uses rather than a Traveller site.

- Suggests that the site is allocated for employment use in the Neighbourhood Plan – Traveller use would conflict with this.

## **Piddlehinton Transit Site - GT/PIWL/004**

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### **Piddle Valley Parish Council**

- With reference to proposals to enlarge the permanent Traveller site and the allocation of land at Piddlehinton (GT/PIWL/004) as a transit site, respondent suggests that the council should reassess the sites suitability taking account of:
  - the access between the sites and the highway (the speed limit on this particular section of highway is 60 miles per hour);
  - the position of the sites near a wastewater treatment works;
  - the position of the sites next to an industrial estate;
  - the remote nature of the site (2 miles from the closest school) and the inadequacy of public transport.

### **Wessex Water**

- The proposed site at Piddlehinton Camp (GT/PIWL/004) lies within the Odour Consultation Zone of Piddlehinton Sewage Treatment Works.

### **Brian Twigg on behalf of Enterprise Park 2017 Ltd**

- Query whether there is a justification for a transit site in this part of Dorset Council area.
- Suggest that a transit site would be better located closer to the Bournemouth, Christchurch and Poole conurbation where the demand for these types of pitches is greater (also taking account of the lack of suitable transit sites in this broad area).
- Note that in accordance with government's 'Planning policy for traveller sites' (footnote 9 relating to paragraph 27) 'There is no presumption that a temporary grant of planning permission should be granted permanently'.
- Consider that the transit site is in an unsustainable location (1.5km from a small village with limited services and facilities) and therefore inconsistent with local and national planning policies (policies INT1 and SUS of the West Dorset, Weymouth & Portland Local Plan and policies B and H of government's 'Planning policy for traveller sites').
- Consider that the proposed allocation and Traveller transit site would have an adverse impact on the landscape (in particular when viewed from the B3134 at the Waterston ridge) and the sites ecology.
- Note the council should have regard to Policies 3 and 6 of the Piddle Valley Neighbourhood Plan and undertake an appropriate assessment to determine whether the adverse effects of the development on Poole Harbour Special Protection Area and Ramsar can be avoided or mitigated.
- Note that it is not clear whether the proposed allocation and use as a transit site would have an adverse impact on ecology.
- Concerned that the proposed transit site would adversely affect the amenity of neighbouring uses on the enterprise park.
- Suggest that the council should consider alternative sites (including the 'Old Friary Press' to the west of Dorchester).

## **Site at Calves Lane, Shaftesbury**

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### **Shaftesbury Town Council**

- Object to site at Calves Lane as it is opposite a school.

### Shaftesbury Civic Society

- The Calves Lane site is already owned/occupied by a travelling family.

### Public response

- Objection to the allocation.

## Enmore Green, Shaftesbury - GT/SHAF/004

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### Shaftesbury Town Council

- Object to site at Enmore Green due to impact on views from Castle Green.

### Shaftesbury Civic Society

- The Enmore Green site is not suitable for development of any type and should be left as agricultural land.

### Public response

- In reference to the proposed Traveller site allocation at Enmore Green (GT/SHAF/004), respondent:
  - considers that the proposed allocation as a Traveller site is inconsistent with broader aims relating to the protection of views and slopes around Shaftesbury;
  - considers that the current agricultural use of the site should be maintained.

## Washpond Lane, Swanage - GT/SWAN/002

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### Swanage Town Council

- Inappropriate site due to flooding.
- Isolated site.
- Site is better used as community use.
- The local plan should include references to the site in the Swanage chapter.

### Studland Parish Council

- Objects to Gypsy and Traveller site proposed in Swanage - far more suitable sites than this location, too close to residential housing and AONB.

### Dorset AONB Team

- This is a relatively small-scale site located close to the edge of Swanage. Considering the close proximity of the site to existing housing development, it is not considered that the small-scale use suggested would be significantly harmful, subject to careful design.

### Community group (non-statutory)

- In reference to the proposed Traveller site allocation in Swanage (GT/SWAN/002), respondent considers that the proposals conflict with the requirements for Swanage and that there are more suitable sites elsewhere (adjacent to the A35 or at Holton Heath).

### Public response

- In reference to the proposed Traveller allocation at Washpond Lane Swanage (GT/SWAN/002), respondents:
  - oppose the proposed allocation;
  - do not consider that large vehicles or towed caravans can achieve access into the site because of its shape and size;

- do not consider that the local roads around the site are safe/appropriate (the junction between Washpond Lane and Ulwell can flood);
- do not consider that it would be viable to carry out the engineering work needed to form a suitable access into the site;
- note that there are not footways on local roads that would allow pedestrians to safely access services and facilities on foot;
- concerned with impacts of additional traffic in the area;
- concern with flooding creating a hazard for traffic;
- note that the proposed allocation is not referenced in the Swanage Local Plan (2017);
- do not consider that the proposed allocation respects or enhances local character;
- consider that the proposed allocation will increase demand on local services (including health care and schools) and that these services would not be able to support the proposed Traveller allocation;
- note that the site is at risk from flooding, that these risks are likely to increase with climate change, and consider that the proposed Traveller site is likely to increase flood risk elsewhere;
- note that the site has been previously considered and discounted for allocation for Travellers;
- consider that use of the site by Travellers could adversely local tourism and local businesses, and that the proposed allocation and use by Travellers would create a poor 'first impression' for visitors to the town;
- concerned about crime;
- concerned that the proposed allocation and use as a Traveller site would disrupt the areas natural beauty, wildlife and people's enjoyment of their homes;
- consider that the proposed allocation would adversely affect biodiversity (including the role of the site as a wildlife corridor);
- consider that the proposed allocation would adversely affect landscape character of the Area of Outstanding Natural Beauty (in particular when viewed from the Purbeck Ridge and Nine Barrow Down), and if the council were to pursue the allocation it should consider measures to mitigate these adverse impacts;
- are concerned about impacts on the Jurassic Coast;
- consider that the need for Traveller sites in this part of Dorset is already addressed through existing public and private Traveller sites around Wareham;
- suggest that needs could be satisfied more appropriately on other caravan or camping sites nearby;
- consider that the proposed Traveller site would adversely affect local house prices;
- consider that the use of proposed Traveller site will generate noise and disturbance which would adversely affect the amenity of neighbouring uses;
- consider that the proposed Traveller site would adversely affect the visual amenity of neighbours;
- consider that the use of the proposed Traveller site would be harmful/incompatible with a nearby school and elderly peoples home;
- consider that the use could intensify or expand, and that this intensification or expansion might be harmful to the local area;
- consider that the sloping site is not appropriate for use by Travellers;
- consider that recreational activity connected with the proposed allocation is likely to have adverse affects on local heathland and landscapes;
- consider the proposed Traveller site could give rise to light pollution;

- consider that Swanage is not a sustainable location for Traveller development;
- stress the need for positive and active engagement between Traveller and settled communities when considering site allocations;
- note that it not clear that there are jobs in the local area for occupiers of the proposed Traveller site;
- suggest that the council should consider other uses for the site (including affordable housing. Suitable Alternative Natural Green Space or other community uses);
- suggest that the proposed Traveller site would pollute the nearby watercourse and Swanage Bay;
- consider that allocation as a site for Travellers would rule it out as a route for a new road in the event that Shore Road is abandoned because of climate change;
- note that the council has not provided details on the management of the proposed Traveller site, and queries how the site will be delivered, whether the use would be monitored, the nature of the use (seasonal, transit or emergency stopping) and whether the council has engaged with the Traveller community when drawing up its strategy;
- note that the chapter of the local plan relating to Swanage does not reference the proposed Traveller allocation at Washpond Lane;
- query whether an archaeological investigation should be conducted prior to the site being allocated for development.

## Higher South Buckland Farm - GT/WEYM/004

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### Weymouth Town Council

- Site is not practicable for 15 pitches given its adjacency to Nottingham village and the stables holiday home development.
- Highway safety concerns - site lies on a blind bend in a 60 mph limit road which already has vehicle restrictions due to its narrowness and on ground which is sloping and wet all year round.
- There are no amenities to the site.
- The site is bordered by a Bridleway which will affect privacy of the site and there is risk that this bridleway is used by unauthorised vehicles.
- Local government policy says Gypsy sites should be away from existing settlements in open countryside.
- The proximity to Nottingham Conservation Area would not respect the character of the area.
- In previous years WPBC could not see the need for a site in Weymouth.
- Consider this a most inappropriate choice of site for a Gypsy and Traveller site and ask for it to be removed from the Local Plan.

### Businesses

- Business owners of Wey Meadow Stables and Wey Meadow Holiday Cottages - opposite the site - clients concerned about changes to the view, privacy and tranquility.
- On rising ground, would be hard to conceal and would overlook properties in area of Local Landscape Importance.
- Bending narrow roads through conservation area.
- Would be unsustainable location by council's own definition.
- No permanent need for site in Weymouth, no travellers live permanently locally and visiting travellers visit in summer holidays only.
- Queries why unused park and ride site has not been put forwards, giving access to primary road network, footways and cycleways leading to facilities.



## Public response

- In reference to the proposed Traveller allocation at Higher South Buckland Farm (GT/WEYM/004), respondents:
  - do not consider that there is any need for Traveller sites in this part of Dorset;
  - do not consider that the site can be safely accessed from existing roads, that the proposed allocation would lead to further vehicle trips on unsuitable local roads, that there are no dedicated footways or cycle routes along existing roads and that proposed allocation could lead to highway safety issues;
  - consider that development is likely to exacerbate congestion on local roads;
  - consider that the site is remotely located relative to shops, schools, play areas, healthcare;
  - consider that there are better local alternative sites for Travellers (specifically land used for Weymouth's park and ride service, and an extension to the existing Traveller site at Piddlehinton) which should be delivered in preference to the proposed South Buckland Farm allocation;
  - consider that the proposed Traveller site will adversely affect the setting of Nottingham's Conservation Area;
  - consider that the proposed Traveller allocation could adversely affect local tourism;
  - consider that the proposed Traveller site would harm rural character and the attractiveness of the countryside and a landscape which is recognised as locally significant;
  - consider that the sloping topography of the site would make development more visible, and impossible to conceal;
  - consider that the proposed Traveller site allocation will lead to direct and indirect (through noise, disturbance and pollution) loss of biodiversity;
  - note that the site is subject to flood risk;
  - note that a high pressure gas pipeline runs through part of the site;
  - consider that use as a Traveller site is likely to increase noise and air pollution;
  - consider that use of the land as a Traveller site is likely to have an adverse impact on local land values;
  - consider that the proposed Traveller allocation could undermine the economic viability of adjacent businesses (including Wey Meadow Stables currently in mixture of uses including 9 holiday homes and a livery yard business) and that Traveller pitches would overlook the existing holiday homes at Wey Meadow Stables;
  - do not consider that the proposed Traveller sites is deliverable because of the costs of forming connections between the site and utilities and services;
  - do not consider that it would be possible to form connection to utilities at the application site.
  - The site is bordered by a Bridleway which will affect privacy of the site and there is risk that this bridleway is used by unauthorised vehicles.

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## Blunts Farm - GT/WIMI/002

### Ferndown Town Council

- Not appropriate to use for G&T site - would impact on recreational use of site, including Castleman Trailway, and neighbouring wildlife sites.

### Ferndown & West Parley Ward Councillors

- A G&T site will impact adversely on existing businesses and ability to attract new businesses.

### Dorset Wildlife Trust

- As this site is now proposed as a Gypsy and Traveller site as well as employment land, we recommend prior ecological survey and assessment to inform the whole allocation and an assessment on impacts on the rights of way on site and any consequent potential changes to recreational pressures on nearby heathland sites.

### Environmental groups (non-statutory)

- Respondent considers that 'Policy HOUS12: Gypsy, Traveller and Travelling Showpeople site allocations' should be revised to ensure that the proposed allocation of a Traveller site at Blunts Farm (GT/WIMI/002) is:
  - consistent with an allocation for employment land;
  - takes account of the Moors River Site of Special Scientific Interest and Site of Nature Conservation Interest; and
  - delivers landscape buffers.
- With reference to the proposed allocation of a Traveller site at Blunts Farm (GT/WIMI/002), the respondent notes:
  - there are ecological interests within the site (including 'Higher Potential Ecological Network') and an ecological survey should be conducted prior to allocating the site and to guide the proposed allocation;
  - part of the site is defined as part of an ecological network;
  - the site is subject to groundwater flooding;
  - habitat to the north of the A31 is being restored;
  - the policy does not reference Uddens Heath Site of Special Scientific Interest;
  - the public right of way running through the site should be maintained;
  - the design and layout should take account of, and seek to preserve, existing trees;
  - the council should consider the impacts of the proposed allocation on publicly accessible woodland at Uddens Plantation.
- With reference to the proposed allocation of a Traveller site at Blunts Farm (GT/WIMI/002), the respondent considers that a buffer should be formed between the site and the A31 and that noise mitigation measures should be delivered.

### Community group (non-statutory)

- Respondent does not consider that the proposed Traveller site at Blunts Farm (GT/WIMI/002) is consistent with the allocation of surrounding land for employment purposes, and notes that land at Blunts Farm has previously been considered for allocation as a Traveller site and discounted (on the grounds of its suitability and the need for Traveller sites).

### Forestry England

- Our future plans do not include the proposed Gypsy and Traveller Site GT/WIMI/002.
- The proposed allocation is according to Fig 123 pitches for Gypsies and Travellers which is 41% more than what is required and therefore we would appreciate it if the allocation for Blunts Farm is removed, as it is unnecessary.

### Ferndown & Uddens Business Improvement District

- Object to G&T allocation and associated buffer - whole of the employment site at Blunts Farm must be used for employment purposes to ensure its development meets its strategic objective.
- Likely that the sites would need to have separate access arrangements.

- Uses are not compatible as the practical commercial effect of the allocation would be to threaten the achievement of the strategic purpose of the allocation to attract and facilitate quality employment providing high value jobs that would help raise the areas GVA.
- There is a mistrust of the Councils intention behind the suggestion that this is a genuine description of a mixed use in planning terms together with the allocation of FERN 10 which would make up for the lost employment land at Blunts Farm.
- Separate allocation for a Gypsy and Traveller site would be more honest and allow for a distinct assessment of the proposal.

### Ferndown & West Parley Ward Councillors

- Strong objections to G&T site on Blunt's Farm which has previously been discounted as unsuitable.
- Could not meet requirements for G&T sites set out in HOUS5, or near services.
- Very close to heathland and public footpaths.

### Businesses

- With reference to the proposed allocation of a Traveller site at Blunts Farm (GT/WIMI/002), the respondent notes:
  - Concern with development of Green Belt - detracts from the natural beauty of the area;
  - Need for more natural wildlife and green areas;
  - Concern with impact on business and employment opportunities - businesses will relocate resulting in more travel and emissions.
- While I appreciate the overall intention of the council in proposing this development is to allow for future business growth within this area I do not understand, or agree, with the logic that suggests creating a residential site for travellers within this development. As a local business that is involved in the production and supply of hardy plants to a national customer base from 7 acres of necessarily fairly open and therefore non secured land. I am seriously concerned about the negative aspects of designating such a site so close to ourselves and other local businesses.

### Public response

- In reference to the proposed Traveller allocation at Blunts Farm (GT/WIMI/002), respondents:
  - are concerned about personal safety and incidences of crimes;
  - are concerned about the impact on house prices if the Traveller site is delivered;
  - note that an allocation for a Traveller site in Uddens Wood (close to the proposed allocation) has previously been discounted;
  - do not consider that it would be possible to form a suitable access into the site without destroying sections of woodland;
  - note that the site is crossed by high voltage power lines which create risks and dangers for the prospective occupiers of the site;
  - consider that the proposed allocation would discourage use of the Castlemain Trailway;
  - consider that the proposed allocation would discourage investment in the adjacent industrial estate and lead to businesses leaving the estate;
  - consider that the proposed allocation would affect the viability of developing the remaining parts of the site;
  - do not consider that suitable privacy or amenity for the occupiers of the site could be achieved;
  - note the site is affected by flooding;
  - consider that the proposed allocation will exacerbate congestion on local roads;

- do not consider that the proposed use is compatible with the adjoining/neighbouring industrial estate, and that the suggested buffer between uses is evidence of their incompatibility;
  - consider that the existing allocation for employment land should be maintained in order to meet strategic needs for this type of development;
  - note that the development site is located in Ferndown and not Wimborne;
  - considers that noise from traffic using the A31 would harm the amenity of those Travellers occupying the site;
  - do not consider that the council has provided sufficient information to justify the proposed allocation;
  - considers that the proposed allocation would lead to loss of Green Belt;
  - considers that the proposed Traveller site allocation would have a damaging effect on tourism and leisure;
  - considers that the access into the Traveller site should not be formed from Uddens Drive in order to protect this resource;
  - note that the proposed Traveller site is likely to have significant effects on heathland habitat sites which would need to be avoided or mitigated;
  - note that two separate points of access are likely to be needed for the employment uses and Traveller pitches.
  - consider that the plan appears misleading in the size and extent that such a site could take up.
- A local Traveller indicates that they would be interested in purchasing the land at Blunts Farm and managing its use for Travellers.

## 16. Policy HOUS13: Other Gypsy, Traveller and Travelling Showpeople sites

### 16.1. Approach

#### Paragraphs 4.11.18-22

##### Environmental groups (non-statutory)

- Respondent considers that the policy should clarify whether Traveller sites are appropriate close to heathland habitats sites (specifically within 400 metres of a heathland habitat sites boundary).

##### Public response

- Respondent suggests that the text in paragraph 4.11.11 is equally relevant to Policy HOUS13 and should therefore be repeated in advance of the planning policy.

### 16.2. Policy

#### Policy approach

##### Town and Parish Councils

- Respondent notes that Policy HOUS13 appears to be more flexible than the policy relating to affordable housing exceptions sites.

### Natural England

- Supports the drafting of paragraph 4.11.19, but considers that the drafting of Policy HOUS13 should be revised to introduce more specific requirements to reflect the supporting text.

### Historic England

- Notes and supports the supporting text at 4.11.19, which requires traveller site applications to be assessed against national and local planning policies including for impacts on landscape and heritage assets.
- Welcome the inclusion of the penultimate bullet point under criterion I in Policy HOUS13.

### Environment Agency

- It should be ensured there is appropriate foul drainage and waste management infrastructure available and put in place at the proposed Gypsy, Traveller and Travelling Showpeople sites to ensure there is no pollution of the environment.

### Public response

- Respondent suggests that the drafting of the policy is revised to ensure that it is consistent with national planning policy relating to Traveller sites, the respondent suggests the following drafting ‘...the use would not result in harmful overlooking, overshadowing or significant adverse effects that cannot be mitigated from noise or light pollution for occupants of the site or neighbours’.

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## Additional criteria

### Town and Parish Councils

- Respondent suggests that the policy should introduce a requirement for regular monitoring of Traveller sites.
- Respondent is concerned about the potential impacts of Traveller developments on employment uses and tourism uses, and suggests that the policy drafting is revised to include a further requirement on this issue.

### Wessex Water

- Suggests that a criteria is added to the policy relating to amenity, and more specifically the need to observe odour buffer zones around existing Wessex Water sewage treatment works.

### Ferndown & Uddens Business Improvement District

- Should include the same clause as proposed for 4.11.11. namely the necessity “not to threaten the desired outcomes of strategic objectives through the development of allocated sites.”.

### Public response

- Respondent suggests that the policy includes a requirement relating to access into and around a development site.