



Dorset Council **Local Plan**



Introduction

2021 Consultation
Summary of Responses

January 2023



Dorset
Council

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1. The Dorset Council Local Plan

1.1. Introduction

What is a local plan?

Public response

- Concern that statements at 1.1.6 differs from the wording of the associated webinar slide – in relation to review of former local plan reviews to inform the production of the draft Dorset Council Local Plan.
- Paragraph 1.1.6 - Local Plan should not be informed by the previous Dorset authorities' progress on local plans as they are all out of date.
- The draft is really just a mashing together of the old district council plans. So it's outdated before it even starts.
- Proposals from the draft local plans of the former predecessor authorities appear to have been merely replicated, without the principles underlying such proposals being reconsidered.
- The whole plan is deeply flawed and is a cut and paste job from previous District Plans.
- Concern that draft Local Plan deviates from the nearly made PLP (the Purbeck Local Plan) in terms of housing numbers, further additional housing numbers yet to be allocated due to oversupply/Duty to Cooperate.

How long does the local plan last?

Please note comments regarding the Plan Period can be viewed within the Development Strategy Chapter under Section 2.10.

The structure of the Dorset Council Local Plan

Local environmental groups (non-statutory)

- In order to address the climate and ecological emergencies (as well as the links to human health and wellbeing) paragraph 1.1.12 needs to be strengthened (see suggested changes in full response).
- Paragraph 1.1.12 - Seek commitment to “enhancing” the “high quality environment” with an additional emphasis on “improving health and wellbeing”.

Public response

- Paragraph 1.1.12. - Concern that “Managing growth” is the priority of the plan – disagreement with the approach – needs a focus on climate change or we'll surpass the tipping point of 2030.
- Aiming for a high-quality environment should hold a higher priority over managing growth.
- Clarification over definition of economic growth.
- We support the strategic approach set out in paragraph 1.1.13.

Use of the words 'will' and 'should'

Cranborne Chase AONB Team

- The word 'should' is interpreted by both applicants and planning committees as optional. We support the concept that the policy is not optional, but cautions that a robust approach will be necessary to ensure that not every case is an exception.

Public response

- Assume that this definition box of what is meant by ‘will’ and ‘should’ will be carried through later drafts of the Local Plan.
- The difference between the words ‘will’ and ‘should’ is worrying.
- Use of the word ‘should’, is too frequent.

1.2. Dorset’s distinctive characteristics

Paragraph 1.2.3 - Coast and Countryside

Cranborne Chase AONB Team

- Advise that paragraph 1.2.3 is enhanced by clarifying that the Areas of Outstanding Natural Beauty are national statutory designations focusing on the conservation and enhancement of natural beauty.

New Forest National Park Authority

- Paragraph 1.2.3 or 1.3.7 – Should include reference to the Council's legal 'duty of regard' to National Parks.

South West Coast Path Association

- Specific reference should also be made to the South West Coast Path National Trail (and England Coast Path).
- Paragraph 1.2.3 - On the rural coast, protections are offered to this corridor by both AONB and Heritage Coast status, and of course the highly valued UNESCO World Heritage Site designation.
- Where the Path enters more developed zones of coastal towns and villages, the quality of the corridor and experience of the Path is much more determined by past and future development.
- Concerns with potentially adverse impacts on the trail - from planning proposals.
- Association would therefore welcome clear indications in development and environment policies that the quality of the corridor through which the path passes will be a significant consideration in decisions.

Paragraph 1.2.5 - Historic Environment

Historic England

- Holistic nature of historic environment and relationships with other planning topics should be recognised.
- Policies could make better provision for conservation and enhancement of heritage assets.
- Promote positive contribution of the historic environment to local character and distinctiveness.

Paragraph 1.2.7 - Railway lines

East Dorset Environment Partnership

- Paragraph 1.2.7 – Does not mention lack of railway links in the former East Dorset area.

Paragraph 1.2.8 - Main east-west route

Town and Parish Councils

- There is a complete lack of understanding about the severe deficiencies of the East – West A31/A35 “strategic route”.

Paragraph 1.2.9 - Economic sector

Public response

- It is difficult to see that information economic sectors quoted in para 1.2.9 are key sectors, based on national comparisons.

2. Issues and challenges facing Dorset

2.1. Environmental issues

Section 1.3

Cranborne Chase AONB Team

- Section 1.3 – does not reflect the scale of the challenge to both conserve and enhance the 56% of the County that is nationally important AONB.

Local environmental groups (non-statutory)

- Section 1.3 – Should refer to the Government’s 25-year environment plan and other similar strategic plans to ensure their delivery.

Paragraphs 1.3.1-4 - Climate Change

Natural England

- Paragraph 1.3.1 - Welcomes the prominence given to the threats to people and wildlife of ongoing climate change and welcome the commitment to address the climate and ecological emergency.
- Likely that the local plan will need to be essentially an environment plan at its core that ensures the delivery of sustainable development, rather than one whose primary focus is simply the delivery of housing numbers.
- Paragraph 1.3.2 - Strategy should make a clear commitment to meeting carbon zero emissions within Dorset by an appropriate date that meets and where possible exceeds the Government’s current international commitments.
- Paragraph 1.3.3 - Supports the link between carbon sequestration and protecting and expanding green infrastructure - should not be solely related to woodland and forest planting, but expanded to include unimproved grasslands, wetlands and heathlands, (particularly peatlands) all of which provide substantive carbon sequestration rates along with other benefits.
- Reversal of drainage of mires will re-establish peat accumulation and reduce wildfire risk.
- Plan should not provide for the protection of forestry plantations planted on heathlands, ancient woodland sites or former priority grasslands, but rather provide a clear aspiration to restore such habitats by supporting the removal of existing forestry plantations as a priority, while supporting a significant expansion of woodland cover elsewhere focused on low grade agricultural land, urban and urban fringe localities.

Historic England

- Looking after the historic environment can help with climate change mitigation and adaptation.

Environment Agency

- Commenting on paragraph 1.3.2, the respondent notes that working with existing communities at flood risk to adapt and become more resistant and resilient, and also avoiding new development at flood risk, are types of adaptation to climate change. This is outlined in the National EA Flood and Coastal Risk Management Strategy.
- Commenting on paragraph 1.3.4, the respondent suggests the following change in drafting: “and increasing storm frequency predicted to increase coastal flooding and erosion risk, as well as inland flood risk.” not simply “coastal erosion levels”.

RSPB

- Paragraph 1.3.3 Carbon sequestration - we agree this is an important adaptation measure.

Local environmental groups (non-statutory)

- Paragraph 1.3.3 - Should read ‘The Local Plan will deliver increased carbon sequestration by retaining uncultivated land, especially priority habitats. New tree planting will confirm to the ‘Right Tree in the Right Place’.
- Paragraph 1.3.3 – Welcome inclusion of carbon sequestration as an output of the plan but relates to not only trees. Reversing decline in other priority habitats is equally important and will better address the ecological emergency declared by the Council.
- Paragraph 1.3.3 - The final sentence of this para should be amended to, “The local plan will deliver increased carbon sequestration by reducing soil disturbance and retaining uncultivated land, particularly where that supports priority habitat, including heathland, neutral and acid grassland, woodland and hedgerows. New tree planting must ensure “right tree right place””.
- Introduction describes the problems Dorset faces, including climate change, the plan itself does not reflect the urgency of the situation.
- In light of the declared climate and ecological emergency the plan should provide a proactive and integrated approach to development that will achieve zero carbon by 2030.
- Support for the initial emphasis on climate change, threats to a fragile environment, and the rich and diversified heritage - agree are major factors in drafting a Plan.
- Regret that the Council has not yet produced clear ‘roadmaps’ to zero emissions and to measurable revival in wildlife habitats and populations. Roadmaps which would show the scale of actions.
- References to Dorset Council’s Climate and Ecological Strategy (July 2020) are welcomed but should be part of an integrated development plan for Dorset rather than a separate document.

Town and Parish Councils

- Paragraph 1.3.3 - The words “heathlands and permanent grasslands” should be added after “protecting trees and forests”.

Public response

- Paragraph 1.3.1. and 1.3.2 – Are inadequate and out of date. 1.3.2. Refers to Annual GHG emissions from 2018.
- Work carried out on these Local Plans were carried out before Dorset Council declared a Climate and Ecological Emergency (CEE), before Covid 19 and before Brexit – legal requirement of Plans to respond to the Climate Change Act.
- Concern that the plan doesn't make DC’s Climate and Ecological Emergency Strategy the central tenet.

- Agreement with initial emphasis on climate change, threats to a fragile environment, and the rich and diversified heritage.
- Implies that environmental concerns are secondary to economic growth and more homes.
- I am pleased to see that “inevitable” climate change and our “fragile” natural environment are the first to be mentioned in the issues and challenges section.

Paragraphs 1.3.5-7 - Fragile Natural Environment

Natural England

- Paragraph 1.3.6 - Welcomes the recognition of the economic value of the natural environment.
- The role of the plan needs to be the protection and large scale restoration of the natural environment.
- Paragraph 1.3.7 - The Cranborne Chase and West Wiltshire Downs Areas of Outstanding Natural Beauty (AONB) is now referred to as the Cranborne Chase AONB.

Historic England

- Nature recovery actions can affect the historic environment, historic impact assessments may be required.

RSPB

- Paragraph 1.3.7 - it is unclear what the plan proposes beyond improving localised areas of green infrastructure close to development sites.

New Forest National Park Authority

- Paragraph 1.2.3 or 1.3.7 – Should include reference to the Council's legal 'duty of regard' to National Parks.

The Ramblers – Dorset Area

- Paragraph 1.3.5 - We suggest that the wording be amended to cover a wider range of influences.

Local environmental groups (non-statutory)

- Paragraph 1.3.5 - Amend to read “...leading to the present ecological emergency and decline of all ecosystem services”.
- Paragraph 1.3.6 – Change “capital” to “natural capital”.
- Paragraph 1.3.6 – Seek a commitment to enhancement of the environment in addition to protection.
- Paragraph 1.3.6 - recommend adding the wellbeing benefits of the environment to this paragraph and add ‘enhancing’ (as well as protecting it).
- Paragraph 1.3.7 - The need to reduce nitrate leaching (including from development) to Poole Harbour to reverse eutrophication and improve the condition of this internationally protected site should be mentioned in this paragraph.

Town and Parish Councils

- Fragile Natural Environment: approach does not make any meaningful commitment to the overall ‘natural capital’ of Dorset.

Public response

- Paragraph 1.3.6 - Concern with fragile natural environment expressed purely as its contribution to the local economy in jobs and sums of money - misses the point that ready access to a natural habitat is vital for residents' physical and mental wellbeing.
- Contradiction between paragraphs 1.3.7 and 1.1.12.
- Concern with design quality of recent developments - particularly from an environmental point of view, loss of ancient hedgerows and impacts on species and habitat.

Paragraphs 1.3.8-10 - Coastal Change and flood risk

RSPB

- Paragraphs 1.3.10 & fig 1.2 - Concern with some of the language used, such as referring to 'environmental constraints' especially when elsewhere in the plan they are clearly identified as major assets in the plan area – suggestion to replace 'constraints' with 'considerations'.

Historic England

- Should be recognised that the historic environment is vulnerable to climate change and schemes to address coastal erosion and flooding can impact the historic environment.

Environment Agency

- Commenting on paragraph 1.3.8 suggests the following change to text: : “Coastal management is therefore a strategic issue addressed through the Shoreline Management Plans and Coastal Groups.” & “Coastal defences are in place or under development at key towns including...”.
- Commenting on paragraph 1.3.9:
 - notes that this paragraph links flood risk primarily to coastal locations which is good considering the risk faced at key towns – however the para should be split in two, to recognise other forms of flooding;
 - suggests that Chalk Streams should be given more of a mention as they o bring flood risk to many villages;
 - suggests that rapid response catchments in West Dorset should be included specifically. (climate change impacts on groundwater, surface water and rivers);
 - suggest the following change of text to: “Flooding can also be caused or exacerbated by“at” the coast; and
 - suggest the following change of text to: “Similarly, in coastal regions susceptible to erosion and coastal slope instability, the council will...”.

Local environmental groups (non-statutory)

- Paragraph 1.3.9 – The Plan should identify the type of damage storms may cause and how the impacts can be managed to reduce risk to lives and property. This could be included under Climate Change Adaptation but it needs far more detailed consideration than just flood risk.

Figure 1.2 The Dorset Council area and its main environmental constraints

Town and Parish Councils

- Figure 1.2 – constraints are limited to the Council's statutory obligations so make no useful statement about the Council's commitment to the broader environmental issues for Dorset.

Environment Agency

- It should be noted that a number of new flood risk models have been completed but not published yet (due to covid). This may lead to some localised change to flood risk outlines which will need to be picked up and addressed through the Strategic Flood Risk Assessment (SFRA).

New Forest National Park Authority

- The boundary of the New Forest National Park should be shown in Figure 1.2 (The Dorset Council area and its main environmental constraints).

Local environmental groups (non-statutory)

- Figure 1.2 – Observes that on a map of Dorset’s environmental constraints, Special Areas of Conservation (SACs) are missing.

Public response

- Constraints map figure 1.2 should be easily linked to more viewable map that can be extended.

2.2. Social issues

Social Issues

Local environmental groups (non-statutory)

- Welcome the emphasis on social issues, the challenge of achieving social justice and of building resilience into communities.
- Social issues have palpable implications for action by Dorset Council using its powers in planning, housing, transport, social services and other fields.

Public response

- Growth is contributing to the deaths of children now and will more in the future.

Paragraphs 1.3.11-13 Housing need

Town and Parish Councils

- Housing needs: identified issues all have a major impact on rural West Dorset villages but are not addressed.

Public response

- Nation has more bedrooms per person than ever.

Paragraphs 1.3.14-15 Transport and access issues

Town and Parish Councils

- Transport and access: ‘social isolation and loneliness’ for many in rural areas. No strategy suggested other than making sure new houses are located close to public transport.
- Paragraph 1.3.14 – COVID 19 is currently making public transport unpopular. Increase of visitors on holiday. Congestion on the A35, increase of journey times and reducing quality of life for residents. Plan is out of date in respect of this.

Network Rail

- One interesting statistic is that the former East Dorset Council area has the highest level of commuting by car or van in England and Wales at 79.5%.

The Ramblers – Dorset Area

- Paragraph 1.3.14 – Travelling from Weymouth/Dorchester to Salisbury requires lengthy train journey with changes and no bus service, despite being an hour away via car.
- Paragraph 1.3.15 – Approach to transport does not mention seeking to improve public transport.

Nexus Planning on behalf of Hallan Land Management

- Paragraph 1.3.15 should be amended to identify a preference for settlements where public transport connections to larger towns are available over settlements where there would be a reliance on the private car.

Public response

- Paragraph 1.3.14 – The plan should include more employment allocation (8Ha at Littlemoor is inadequate).
- The travelling time by car in paragraph 1.3.15 should be extended from 15 to 20 to 25 minutes.
- Vastly more private cars than it needs.
- Pollution from vehicles is killing children and asthmatic (etc) adults.

Paragraphs 1.3.16-18 - Health and wellbeing

Public Health Dorset

- Paragraph 1.3.16 - Should reference the Dorset Health & Wellbeing Board's strategy for defining the health and wellbeing challenges facing Dorset.

Natural England

- Paragraph 1.3.18 - Welcomes and supports the link between health and wellbeing and the provision of accessible green infrastructure.

Historic England

- Should be recognised that the historic environment can make a positive contribution to health and wellbeing.

Local environmental groups (non-statutory)

- Paragraph 1.3.18 – Wish for added reference to mental health benefits of “healthy lifestyles”.
- Potential win/win/win links between protecting the natural environment, reducing the use of fossil fuels and promoting physical and mental health.

The Ramblers – Dorset Area

- Paragraph 1.3.18 – Importance of walking and cycling for health and well-being has been demonstrated very well during the lockdowns.

Town and Parish Councils

- Contradictions within the Plan e.g. enabling healthy lifestyles yet proposing loss of recreation facilities.

Paragraphs 1.3.19-21 - Aging population

Town and Parish Councils

- Paragraph 1.3.19 – More data needed due to COVID and increasing number of working-age people moving to Dorset to work from home, reducing expected increase in elderly households.

- Lack of solutions presented for infrastructure such as transport, facilities or connectivity that may help with an aging population. Don't believe the Plan, as currently stands, addresses any of these issues for rural populations.

Local environmental groups (non-statutory)

- Plan does not provide for the needs of people suffering from social isolation and loneliness.

Public response

- Paragraph 1.3.19 - Burden of Council tax will continue to fall on a decreasing base of working age families, unless high quality (high paid) employment is made available - people will no longer be able to afford to live and work here.
- Paragraph 1.3.21 - Significant majority of residents quite like the social isolation of living in Dorset - concerns with impacts of high density and poor quality amenity space on quality of life.
- Support for recognising high levels of isolation and loneliness, increased accessibility to town centres and countryside awareness.

2.3. Economic issues

Paragraphs 1.3.22-25 - Employment

Town and Parish Councils

- Paragraph 1.3.22 – Data on economic issues seems weak and more work is needed.
- Paragraph 1.3.22 - Object strongly to the wording “Lower-skilled occupations like farming...” It would be better to say “poorly-paid occupations”, as elsewhere in the plan.

The Ramblers – Dorset Area

- Paragraphs 1.3.22 – 1.3.25 – No mention of the impact of the pandemic on retail and hospitality sectors.

Local environmental groups (non-statutory)

- Wish to see a major effort to diversify local economies within the county - strong focus on green jobs and circular economies which also contribute directly to solving the climate crisis.

Public response

- Paragraph 1.3.24 - Approach is not going to solve the perceived issues of today or indeed position the town for sustainable success for the next 2 generations.
- Industrial needs are not well addressed - statement at 1.3.19 indicates a smaller workforce but need to provide additional 21000 jobs and 131ha more land.
- work patterns have shifted recently including growth of service economy including hospitality and care and health services, employment areas not included in employment strategy; consider current level of under occupation and vacancies in existing employment areas.
- We support the comments made in paragraph 1.3.23.

Figure 1.3 Comparison of average salaries in Dorset, BCP, and England

Town and Parish Councils

- Would prefer use of median rather than average salary information.

- Low wages, issues of matching skills to jobs and difficulties of mobility/transport: support for farming and the smaller rural –based industries, together with the relevant public transport is not addressed.

Public response

- Figure 1.3 - Should be using the median rather than average salary. Average is distorted upward by very high earners.
- A majority of local people are in low paid jobs (refer Housing Needs Assessment). Using ‘average’ as a means of showing salary is thus a statistical blindside, a ‘median’ measure should be applied.

Paragraphs 1.3.26-27 - Broadband Infrastructure

Town and Parish Councils

- Broadband: the lack of connection in rural areas adding to isolation. No strategy is suggested other than making sure that new homes have good connections.

Tourism

Public response

- 1.3 - A critical trend facing parts of Dorset has not been recognised, this being the significant decline in tourist numbers in Weymouth and Portland over the last decade.
- Tourist accommodation within Weymouth is ageing, Bed and Breakfast establishments are becoming outdated, and holiday parks need to make robust changes to their offer to continue to respond to changing demands of guests.
- Investment is required to improve the area’s ability to attract new and repeat visitors.
- Tourism is a key economic driver within the Weymouth area.

2.4. Mapping and Glossary of Terms

Mapping

North Dorchester Consortium

- Proposed Development Sites Maps at the end of each settlement chapter should show proposed settlement boundaries around proposed allocations alongside existing boundaries.

Pegasus Group on behalf of Persimmon

- Map at the end of the settlement chapters in the Plan appear to show some sites as being included within settlement boundaries, but others located outside. The respondent suggests that where the council proposes an allocation, development boundaries should also be revised to enclose the site as part of the settlement.

New Forest National Park Authority

- Proximity of New Forest National Park to Dorset should be recognised and shown in relevant figures and diagrams within the Plan, including Policies Map.

Bryanston Parish Council

- The Proposals Map would be more meaningful if it included the AONB boundaries.

Public response

- The Dorset Ecological Network (existing and potential) Maps should be added to the ‘main environmental constraints’ map at Figure 1.2.

Glossary of terms

Historic England

- Add glossary to include definitions related to the historic environment.

Public response

- Some elements of glossary need additional clarification.
- Lack of a Glossary when the Plan was published.