

Critique of the Dorset Local Plan (“DLP”) 2025

1. Summary

As it says on the tin, this section aims to summarise the arguments which are fleshed out in more detail in the following section. Since the following section starts with a whinge about the volume of material that the responsible resident is required to go through to compose considered responses to a consultation, it seems best to enable those with less time to read a quick summary, which is supplied with helpful cross-references (numbered and marked [thus in Word](#)) to link to the paragraphs in the critique which follows.

2. Critique:

This section aims to delve into some of the aspects of the DLP which have given rise to concern, trying to analyse how the authors of the DLP arrived at their positions, questioning whether this approach is appropriate and attempting to highlight some of the issues which the analysis discloses. This section contains full references and links to the DLP and supporting documentation as well as other relevant materials in footnotes.

3. Responses to Questions 1-45:

The DLP asks for responses to 45 questions in the online survey (it is also possible though probably not very useful to submit these in hard copy). Given the volume of materials which need to be consulted to formulate considered responses, it's not clear whether the DLP expects all consultees or respondents to provide feedback on all questions or even if it is possible to do so. This section makes an effort to respond to as many of the questions as possible in an informed way.

- (1) The total volume of consultation materials is considerable, even before the related materials associated with the Local Transport Plan are taken into account. The main consultation document runs to 93 pages while a selection of the important Appendices and Supporting Papers run to over 1,200 pages. This makes it very difficult for consultees and residents read, digest and analyse matters on a DC wide basis, so there will be a natural tendency to focus on what is critical with respect to a given locale rather than viewing the larger picture. This approach will produce feedback which skews to the locales with the most participation and more or less ensures that very few except the authors of the consultation and some larger bodies (e.g. CPRE) will attempt to take a DC wide view. [1]
- (2) The structure of the consultation is formatted with 45 questions each coming at the end of various sections which discuss specific issues. However, the questions are more often than not framed in a manner which does not admit any challenge to a fundamental premise. For example. Question 9: *“The Local Plan sets out a strategy to meet the area’s housing needs through allocating sites for new homes, the flexible settlements policy, new settlements and the efficient use of land. Are there any other measures could help to meet housing needs?”* However, at this point in the consultation the DLP has not provided any context for what it means by “need” or whether “need” is estimated correctly. This is simply not the right question and not the only instance of the DLP skipping the preliminaries to get to a question it wants to ask in a manner which skews the results. [2]
- (3) Following from this, the DLP does not challenge some of the basic data or inputs which seem to lead to inconsistent, confusing and exaggerated outputs. Much of this is driven by a top-down mandate for targeted housing build which has supplanted the more traditional bottom-up granular determination of need based on demographics and econometric analysis. The DLP may well be fulfilling a central Government mandate in doing so, and it’s fine for the Government to redefine “need” as target build, or even “day” as night, however, it would make for a much better and certainly more informed consultation were the DLP able to present the methodology outputs of a more statistically sound bottom-up approach if only to inform the discussion for consultees and residents. An analysis of the inputs for the current standard method used to derive housing “need” shows that some of these are out of date and will only become more out of date over time, raising basic questions about whether the DLP should avail itself of the latitude allowed under the NPPF to apply alternative methods in exceptional circumstances. [3]
- (4) Quite probably in common with many other Local Authorities, the application of the standard method to derive targeted new build housing produces a great deal of tension with almost every other method of forecasting demographics, economic growth, as well as actual need. This produces a large number of unresolved inconsistencies, which are even more troubling in Dorset given the fact that Dorset is such an outlier in several critical respects (large area with lower population density, older demographic, poor transport connectivity among

those). Consideration of these and the necessary adjustments which they demand is generally absent from the consultation materials, to their detriment.[21] and the general tension with customary methods of forecasting can also be observed with respect to employment[29] and Infrastructure [34].

- (5) The summary conclusion of applying more accepted means of forecasting need is that actual demand for the targeted new build housing will have to be marketed heavily to an internal migration market with the most susceptible being those who can commute to areas of current employment not least because actual employment growth in Dorset itself will – at best - take time to deliver. This first set of internal-migrants is likely to focus on Eastern Dorset which currently exhibits a very strong connection with BCP. The logic for proposed large new settlements (e.g. Crossways, Bridport, North of Dorchester) is not supported by this initial trend.
- (6) While these major developments may eventually fulfil the DLP's requirements in terms of aggregate targeted new build housing, the DLP admits a risk that they cannot do so in the near/medium term if they happen at all. This fear of not meeting targeted new build housing leads the DLP authors to propose other means of achieving this ambition, particularly driven by consideration NPPF paragraph 11. This leads to the proposal of a "Flexible Settlements Policy" which – it is alleged - offers some scope for meeting a three-year (rolling) target of new build housing. However, since the policy relies on the sort of speculative development which the general vision of the DLP opposes, the DLP cannot specify where, when or in what quantum it would be manifest. The logical conclusion of any analysis of the Flexible Settlement Policy is that it prevents speculative development by calling it Flexible Settlement instead. [45] Moreover, the proposed policy which stems from a proposed abolition of settlement boundaries, seems to contravene both primary legislation and the DNL Management Plan, meaning it is not applicable in the DNL or other National Landscapes which cover ~60% of area encompassed by the DLP and a third of the Tier 3 villages considered targets for losing their settlement boundaries.[54]
- (7) The overall picture presented by the DLP is concerning since it seems to promote overbuilding in relation to assessed economic or demographic or local need (as the word is commonly understood) in pursuit of build targets which will be difficult to achieve even with considerable relaxation of planning restrictions which have previously been consulted on and agreed. Since more than 100% of the targeted new build is directed at attracting internal migration, there is a serious risk that it results in increased commuting as any growth in employment opportunities and supporting infrastructure lags residential building. It also carries with it the second order risk of attracting more second home ownership unless there is a DC wide provision for "primary residences" similar to Policy H14 in the Purbeck Local Plan[.53]
- (8) Of particular concern to LMPC, is the standing of the recently adopted (2024) Purbeck Local Plan ("PLP") and the extent to which its provisions will be safeguarded or superseded in the DLP. The PLP is not referred to directly in the DLP. A search for indications that the integrity of the PLP will be respected, or its

provisions continued, under the DLP does not yield encouraging results. This is concerning with respect to Heathlands Protection, where the language is quite comprehensive in the PLP, but rather woolly in the DLP, which also notes that the originally consulted 19% increase in housing to 2038 within 5km of heaths, “might have to increase”, with consequences for mitigation strategies. Any reasonable observer is entitled to inquire as to the point of consulting on plans – including this one – if they are so quickly followed by a new model which seeks to make existing consulted and agreed plans obsolete. [58]

This is perhaps more concerning regarding provisions in the PLP which were designed to address housing market issues which are notable in Purbeck, but also feature in other parts of Dorset. Here we refer in particular to Policies H14 on principal residence and H11 on affordable housing with the overriding condition that 40% of developments with over 10 dwellings should be mandated as affordable in perpetuity.[52 53]

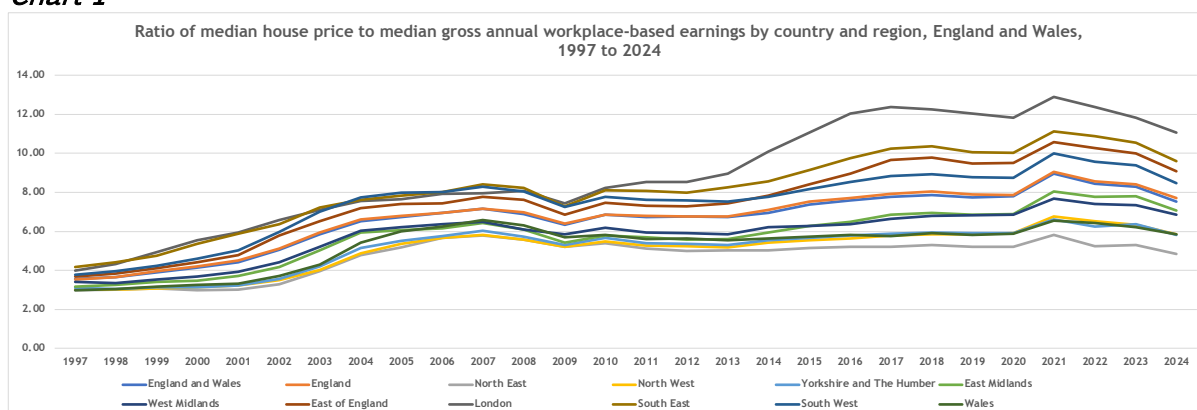
1. **Overall Consultation Process:** The survey provided by DC on a section-by-section basis is ostensibly intended to canvass views as widely as possible and encourage participation through a high response rate. However, even the overview document is (a) dense (b) crowded with specialised language and (c) runs to 93 pages. There is an even larger volume of supporting documentation. It is fundamentally misguided to assume that this approach is likely to generate the level of participation sought or required on a Dorset wide basis. Inundating the populace of Dorset in a deluge of planning minutiae as this does is likely to encourage the very opposite of the stated intentions. Residents and (one fears) even responsible Town and Parish Councillors will determine that they are best advised to devote what time and resource they can allocate to this process by focusing on their immediate locale. This compromises the quality of the feedback and jeopardises the entire process.
2. **Questions in the Survey:** The Survey is structured so that there are questions at the end of each section where the DLP seeks feedback, starting with *Question 1: Do you have any comments on the proposed vision for Dorset?* However, the fact that DC does not provide space in the survey for feedback on the overall process implies an assumption that the process is just fine as it has been presented. This is certainly not the case and views on the overall process and the overriding issues should be sought as much as answers to predetermined questions which otherwise have the effect of cancelling discussion of the more important matters the DLP gives rise to.
3. **Housing Need Calculation:** The use of the Government imposed nation-wide formula (the standard method) produces results which conflict with more detailed, empirically sound, bottom-up methods. It is well recognised that it is not by choice that DLP is forced to use the new standard method as set out in the NPPF approved by the central Government in December 2024. However, the application of the standard method should not go unchallenged in the consultation. The first and most basic question in the survey should be *“Do you feel that the application of the standard method to assess housing need in Dorset has any merit or basis in fact?”*. If the answer to this question is not resoundingly in the affirmative, then it is safe to conclude that the entire consultation exercise is conditioned by an overriding difference of view which should be reflected back to Government.
4. Councillors and residents will note the resulting output from application of the standard method, but it is also worth examining how those numbers have been arrived at to demonstrate how flimsy the result is compared with existing and readily available data-based analysis.
5. The output sought by application of the standard formula is a “housing requirement” defined as the minimum number of homes that a plan seeks to provide during the plan period.¹.
6. A baseline value is set using the existing housing stock for the area of the local authority multiplied times 0.8% of the existing housing stock for the area. The existing

¹ [UK Govt. guidance on housing-and-economic-development-needs-assessments](#) Paragraph: 040 Reference ID: 2a-040-20241212

housing stock in Dorset was estimated at 188,556 (189,000 on a rounded basis) dwellings² in 2024 and therefore 0.8% of that =1,512 which forms the baseline of annual housing need.

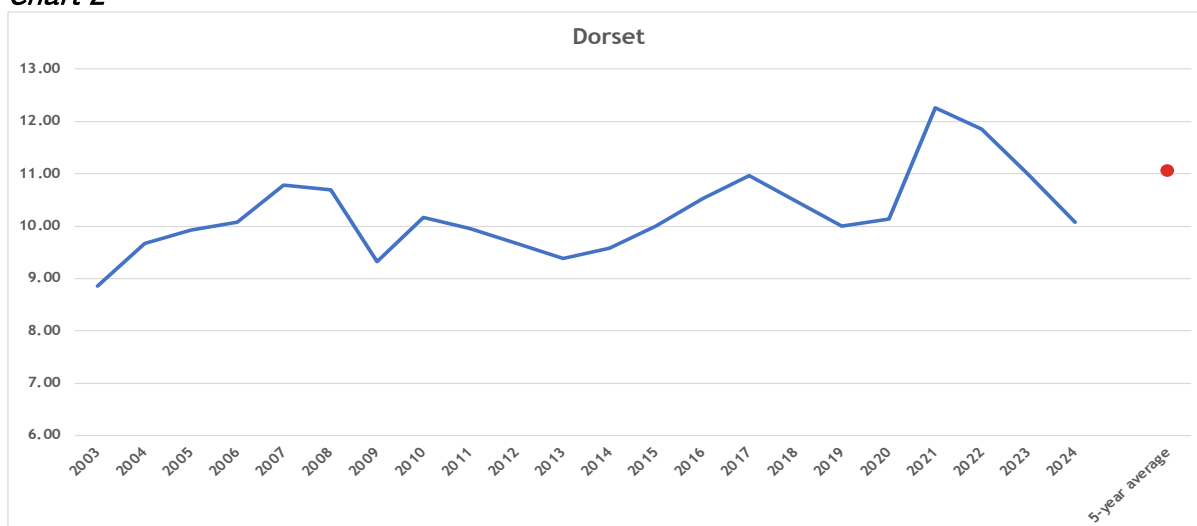
7. The standard formula then applies an adjustment factor as follows: Adjustment Factor = $((\text{five year average affordability ratio} - 5) / 5) \times 0.95 + 1$, where the data for the five year average is supplied by the ONS³.

Chart 1



8. Before looking at the implications of all this for Dorset, it is worth considering the trend and applicability of the five year average nationally, since even the casual observer will note that the trend line was declining until the then Government introduced measures to boost housing demand for first time buyers through SDLT relief which was phased out in 2021, but not before the creation of a minor bubble all in an apparent attempt to mitigate lack of affordability. The point remains that the trend now continues downwards and using five year average data overstates the “affordability issue” by 5-8% for the regions above (see Chart 1).

Chart 2



9. The data for Dorset shows that the exaggeration of the “affordability issue” by applying a five year average is even more extreme at 9% (see Chart 2) with a five year

² [government statistical data sets table 125](#) – see row 389 for Dorset.

³ [ratio of house price to work place based earnings](#). The data for Dorset is to be found in tabs 5a-5c row 283.

average of 11.06. This is largely because Dorset suffered an abnormally high impact from the Government's approach to make housing more affordable for first time buyers in 2020 which has unwound since then. This unwind has taken Dorset's affordability ratio down to 10.07 in 2024 based on Government statistics, back below the 10 year average of 10.68. While the base numbers have changed since DC commissioned a study on housing needs in 2021, the conclusions are now broadly similar to those reached then that *"that median workplace-based housing affordability ratios in BCP and Dorset have not significantly worsened since 2003. This is aided by an improvement in Dorset from 2017. This contrasts with the national and regional figures which increased more notably and in particular since 2009."*⁴

10. While much of the above may fall into the realm of lies, damn lies and statistics, what is surprising is that there appears to be no reference whatsoever in the volume of material produced in connection with the DLP Consultation to the questionable underlying basis of the formulaic calculations with respect to the use of 5 year average affordability ratios even though they evidently distort the calculation by ~10%.

11. Plugging the unchallenged numbers into the standard method formula to obtain the adjustment factor results in the following:

$((11.06-5)/5)*.95+1$ or $(6.06/5)*.95+1$ or $(1.212)*.95+1$ or $1.1514+1$ or 2.1514 rounded to 2.15, implying a more than doubling of the housing stock derived baseline figure for annual housing "need" ($2.15 \times 1,512 = 3,246$ or $3,250$ rounded) or 55,182 new homes over the planning period of 17 years.⁵

12. This annual "need" figure can be compared with 2018 target of 1,793 new homes per annum, or ~81% increase in the annual delivery of new homes. It can also be compared with the actual number of new homes delivered over the past 5 years which averaged 1,604 through 2024.⁶ A more appropriate comparison might be the projected increase in housing stock of **31% over the period to the end of the plan in 2043**, or an additional 26,000 dwellings on current plan, equivalent to an incremental 13% of the current housing stock (allowing for the growth expected in 2025 and 2026).

13. A 30+% expansion in the housing stock over a period of 17 years leads directly to the fundamental question of whether there is anything observed by DC or the Govt. in terms of Dorset's economic development which suggests that such a level of growth is warranted.

14. It should be noted that the Govt. accepts that the inputs will change, with housing stock numbers updated annually (May), and affordability similarly (March), which could be seen as allowing for the observed trend to assert itself in the outputs. However, the

⁴ "Dorset and BCP Local Housing Needs Assessment", Iceni Projects Limited for BCP and Dorset Council, November 2021 section 4.31, p.40 also 4.32 p.41 for lower quartile again arguing the affordability trend in Dorset stands in contrast to the national averages..

⁵ See also Dorset Council Local Plan Options Consultation Background Paper – Housing Numbers August 2025 section 3.3

⁶ Ibid. section 4

Govt. has also declared that the outputs used now should be valid of 2 years, so even as the tension with reality gets more extreme, the outputs will be retained.⁷

15. The use of current housing stock as the basis for determining “need” is of course highly suspect and also goes unchallenged in the consultation materials. Equally there appears to be no attempt to justify the use of housing stock as a proxy for baseline housing “need”, so consultees and residents are presented with an unchallenged output of an unsupported input⁸. A better basis for estimating actual need is available and has been prepared as recently as 2021 by DC itself. There is also the apparent willingness of the Government to countenance the use of alternative methods if the local authority wishes to make a case for using alternative methods.⁹ The DLP could present an alternative method if only to contrast it with the outputs from the application of the standard method.
16. The absence of a more critical approach in the DLP is surprising in the context of the evident concern about second homes throughout Dorset, to the extent that DC introduced double council tax on second homes in 2025¹⁰. If DC considers that the number of second homes in the County to be significant, it might have considered raising the point that the shift from using Households to establish baseline housing “need” in the standard method in 2021 to the use of Housing Stock to establish baseline housing “need” in the standard method in 2024 has a disproportionate inflationary impact on the output. ONS data here varies and is confused by the formation of the Unitary Authority but in 2021 it was estimated that there were 170,290 households in Dorset and 181,739 dwellings or units of housing stock¹¹.
17. Challenging the standard method on the two reasonable statistical grounds of two inputs (households vs. housing stock and affordability as above in paragraph 10) which inflate the “need” in Dorset could be made by simply restating the applied standard method as follows:
 $((10.07-5)/5)*.95+1$ or $(5.07/5)*.95+1$ or $(1.014)*.95+1$ or $0.96+1$ or 1.96 x an adjusted baseline figure of (~177,000 households -assuming all new growth 2020-2024 came in the form of primary residences x 0.8%) or 1,416 for annual housing “need” ($1.96 \times 1,416 = 2,775$) or 47,172 new homes over the planning period of 17 years. It’s a plausible argument based on the two evident exceptions which statistics for Dorset exhibit and it is strange that the DLP has been drafted without presenting any of this to consultees or residents.

⁷ [UK Govt. guidance on housing-and-economic-development-needs-assessments](#) Paragraph: 008 Reference ID: 2a-008-20241212

⁸ The Govt. paper on the matter stats without apparent irony that “*Housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share of the national total that is proportionate to the size of their current housing market.*” [UK Govt. guidance on housing-and-economic-development-needs-assessments](#) [Paragraph: 005 Reference ID: 2a-005-20241212]. While the point about spreading the burden of growth across existing housing stock is accurate, the huge and disproportionate increases in housing resulting from the application of the standard formula undermine the contention that housing stock is stable or predictable.

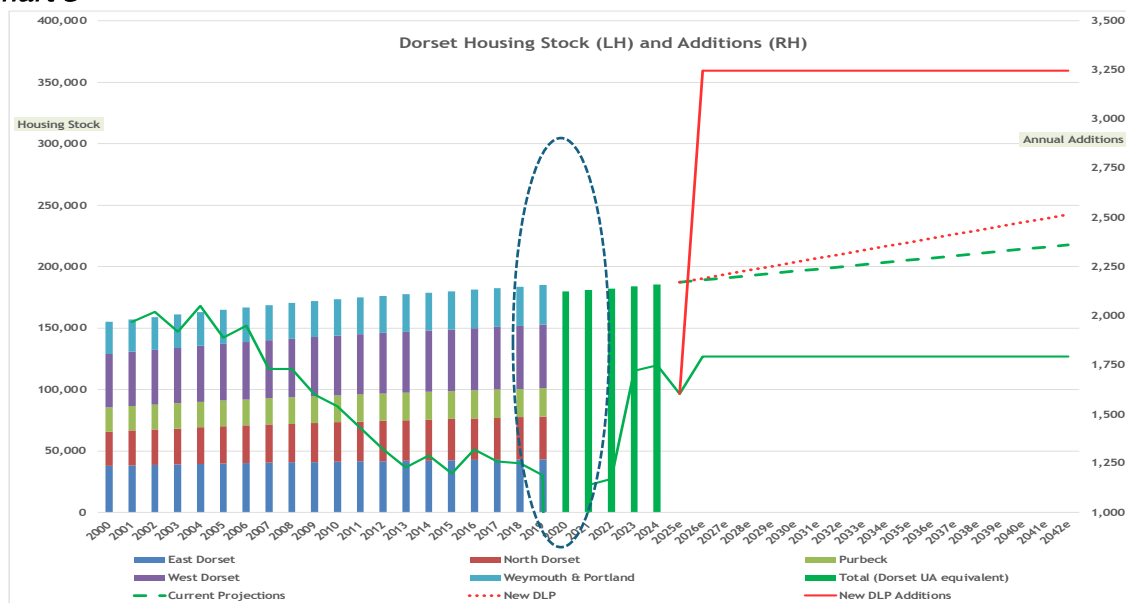
⁹ [UK Govt. guidance on housing-and-economic-development-needs-assessment](#) Paragraph: 015 Reference ID: 2a-015-20241212

¹⁰ [DC Council Tax on Second Homes](#)

¹¹ Dorset and BCP Local Housing Needs Assessment Icen Projects Ltd. for BCP and Dorset Council November 2021 3.2 p 20 5.2 p.55. Elsewhere estimated at 195,404 dwellings in Dorset in 2021 see *ibid* p. 31

18. It might also be worth pointing out that while the standard method used to be applied to households, by applying it to housing stock it embraces unjustifiable distortions yet is still defined as “need”. In fact, it is now a purely **supply driven formula** where demand is assumed to follow and as such cannot define “need” in any accepted use of the word. It is simply a formula to generate a new build target regardless of demand. The consultation materials might have attempted to explain this to residents and consultees at least to provide some context.
19. The DLP does refer to the more bottom-up more demand-oriented analysis which it deployed in the iteration of the local plan exercise in 2021¹², but seems to just accept that “everything has changed” with the new standard method. This is particularly odd, given that the 2021 exercise openly took advantage of the leeway provided to present alternative methodologies and used the research commissioned at the time to challenge the application of such a “top down” approach.¹³ And this despite the dramatic impact this new standard method based approach has on Dorset (see Chart 3)

Chart 3



Note that there is an aberration in the various statistics for 2020 when the UA was formed which amounts to 3-5,000 dwellings.

¹² Dorset Council Local Plan Options Consultation Document 2025 4.2.2, p.26

¹³ Impact of Housing Need Sensitivity Housing Need in BCP and Dorset, Icen Projects Limited for BCP and Dorset Council November 2021 1.5, p.1 *“The ‘Review of Housing Need’ document examined whether there were exceptional circumstances in BCP and Dorset for diverging from the standard method. This revealed that there were exceptional circumstances in BCP and to a lesser extent in Dorset.”* On this occasion, it appears DC’s consultants solved for absence of demand for increased “need” beyond what the standard method ordained. See also Review of Housing Need Examining Demographics and Testing the Standard Method in BCP and Dorset Icen Projects Ltd. for BCP Council & Dorset Council December 2021 for justification of divergence from the Standard Method applied in 2021 4.11 *“Within the modelling, migration assumptions have been changed so that across the two areas the increase in households matches the housing need.”* (sic).

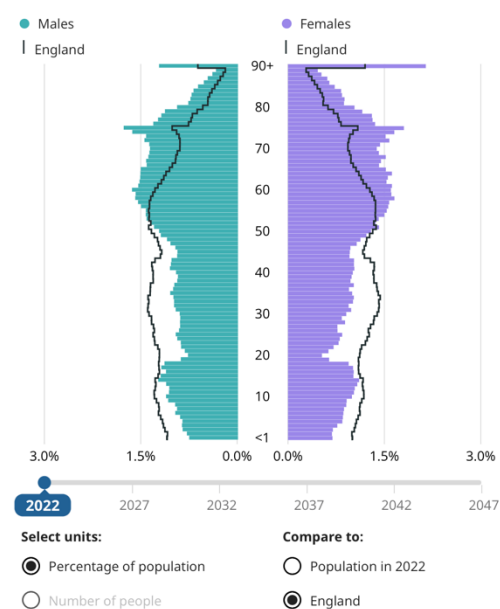
20. Moving on from the apparent reluctance to question the application of the standard method in the exceptional circumstances exhibited in Dorset, the next question about the consultation is why it does not focus on the exceptional circumstances of Dorset's demographics. Most observers would consider demographics more relevant for establishing actual housing need than the number of edifices which can contain residents today.

21. **Demographics:** When demographics were considered in some detail in 2021, the consultants employed by DC went through all sorts of statistical contortions to make the numbers of prospective occupiers add up to the then standard method's prescribed quantity of houses to be built. The derived housing demand figures coming from population growth and household formation were adjusted in an attempt to model demand for new dwellings which otherwise fell short of what the then standard method of assessing "need" suggested. Perhaps the requirement to undertake even more elaborate reverse engineering to make the current standard method ordained target "housing need" fit demographic patters at almost twice the quantum of 2021 explains why the DLP eschews discussion of demographics in the consultation materials.¹⁴

22. Further exploration of demographics undermines the DLP in other respects, particularly on examining population growth and profile. Looking at profile first, it is clear that Dorset has and will have an aging population. This can be seen in the projected age profiles for Dorset in 2022 and 2043 below¹⁵

Age profile in Dorset

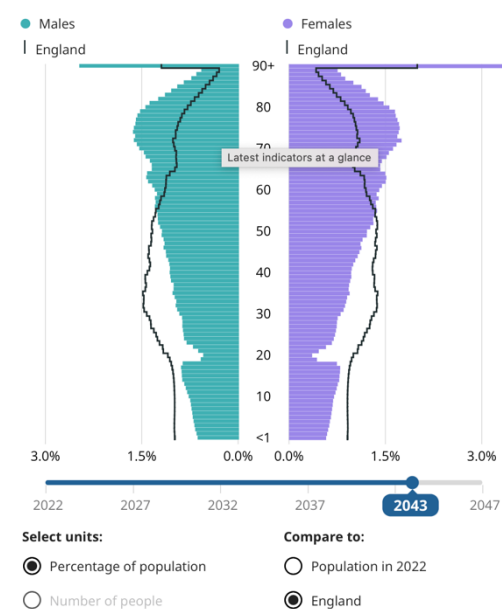
Projected population age structure by single year of age and sex for Dorset, 2022 to 2047



Source: Subnational population projections for England from Office for National Statistics - Migration category variant

Age profile in Dorset

Projected population age structure by single year of age and sex for Dorset, 2022 to 2047



Source: Subnational population projections for England from Office for National Statistics - Migration category variant

¹⁴ Dorset and BCP Local Housing Needs Assessment Icen Projects Ltd. for BCP and Dorset Council November 2021 6.44 p 81. Dorset Council Local Plan Options Consultation Document 2025 4.4 nods in the general direction of a deeper analysis of demographics with respect to meeting the housing needs of specific groups, but there is no broad demographic analysis presented.

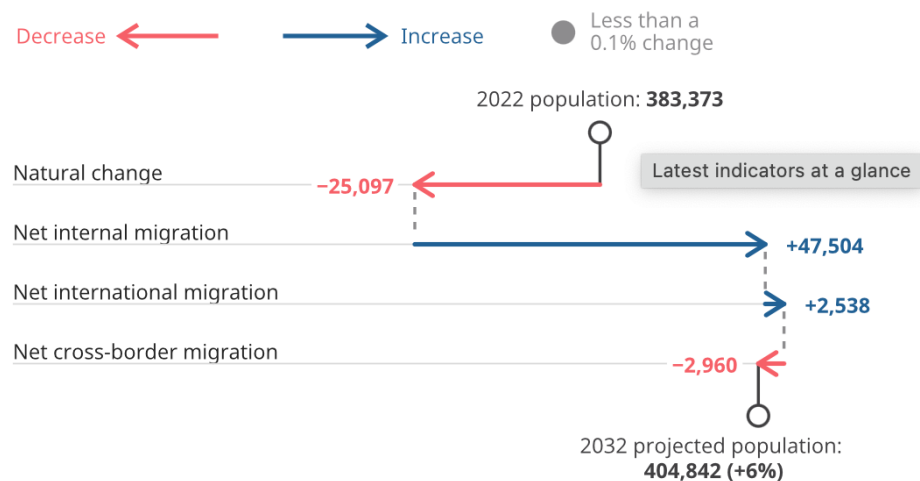
¹⁵ [ONS subnational pop projections](#)

23. This distinct skew toward an older population carries a number of implications – with respect to the sort of housing stock which might be better suited to an aging population (bungalows; retirement housing, sheltered housing assisted living, walkable communities etc.¹⁶), and particularly the surrender of existing dwellings to the open market, which should theoretically provide a source of supply to meet actual housing need.
24. *Prima facie*, this source of housing supply cannot be counted toward the standard method's derived "housing need" because it does not require new build, and the standard method is not really concerned with anything else. However, this source of actual supply is an important consideration, and it is odd that the DLP is silent on the matter. It would be perfectly reasonable to point out that a deterrent for those developers taking financial risk in large scale development lies in a ready and growing source of supply of housing which can undercut their business plans.
25. It is difficult to estimate the quantum of supply from inheritance sales but the average in the UK is ~20% of all sales. This should be adjusted upwards to reflect Dorset's significantly higher age profile (implying more deaths), and downwards to reflect Dorset's marginally greater wealth per capita (implying more flexibility around inheritance). However, a reasonable estimate would be ~22-25% of the ~6,000 non-new-build sales which take place in Dorset annually or 1,300 dwellings or about 40% of the housing build target. This quantum is more than enough for any developer factor into the economics of undertaking new build and more than enough to merit some attention in the DLP as a source for meeting actual need.
26. If Dorset's current population is dying out, then why is the DLP proposing to increase housing stock by 30% and where will the demand come from ? Unfortunately for residents and consultees the answers have very little to do with Dorset residents or consultees and everything to do with inward migration, which is not mentioned in the DLP apart from with reference to a rare and vulnerable bird species. Again the ONS is more helpful per the below chart (Chart 4)¹⁷.

¹⁶ Cf. [FT: Where is all the housing for older people? 2025.10.04](#)

¹⁷ [ONS subnational population projections](#)

Chart 4



Source: Subnational population projections for England from Office for National Statistics – Migration category variant

27. ONS data presents a base case out to 2032 where roughly 200% of the demand for housing is driven by migration with 95% of that internal migration. It's very odd that in a consultation targeting Dorset residents it is never mentioned that a 30% increase in housing stock is in large measure designed to offer supply to those who do not live in Dorset today. Possibly the best guide to where the internal-migrants will come from is the current pattern of commuting in and out of the various areas of Dorset, which suggest the viability of maintaining employment elsewhere but moving to new-build in Dorset. Studies here emphasise the expected close connection of certain areas with larger centres of economic activity (e.g. Purbeck to Poole and Eastern Dorset generally to BCP), none of which bode particularly well for reduced road travel.¹⁸
28. Again, there is evident tension between the ONS approach to estimating population growth and that derived from the establishment of a housing target, which has to be solved either by assuming much more population growth (so far the ONS has not complied) or a significant reduction in the average number of occupiers of any dwelling.¹⁹
29. **Employment:** The data aberrations observed with respect to housing stock and demographics are also present in the analysis of the employment which is required to support the 30% increase in housing stock. The DLP is informed by a further study dated March, 2024 which covers the BCP and Dorset Functional Economic Market Area ("BCP & Dorset FEMA").²⁰
30. The application of the standard method implies a very much larger than imaginable number of jobs will be created to support such an increase in housing "need" necessitating an unwelcome large allocation of land to employment sites. While this

¹⁸ Dorset and BCP Employment Land Study Final Report, ICENI, March, 2024 ("D&BCP Employment 2024") section 4

¹⁹ See Appendix 1

²⁰ D&BCP Employment 2024

would be internally consistent, it compounds the issues faced in the DLP of identifying enough sites to build new houses to the target by requiring the build of new employment sites to fill the all the jobs which will be created simply because the houses have been built

31. In the real world, one might ask where the growth for all this is meant to come from and adjust all targets to conform with expected economic growth. In this case, the Employment Study engages in a number of contortions (“adjustments” under an “alternative demographic”) so the resulting figures are not so evidently dubious.
32. In terms of actual forecasts, application of the standard method produces growth in jobs in the BCP & Dorset FEMA of 81,200-82,700²¹ compared with the baseline growth of 47,400 jobs, which is equivalent to 39,600 FTEs (full time equivalents – allowing for part-time jobs) 2021-2039.²² For the DLP, the baseline numbers are too low to justify the new build housing target as they mean less than 20,000 new FTEs are created in in the Dorset part of the FEMA 2021-2039 versus ~50,000 new dwellings over the same period.²³ However, it is also a problem if the DLP has to come up with enough employment sites to fulfil Dorset’s share of ~67,000 FTEs as forecast through application of the standard method.
33. The goldilocks solution here is to come up with a means of forecasting something between the two extremes which does not force BCP and Dorset to demand allocation of an unjustifiable number of hectares of employment land for new sites but one which still offers a crutch for the application of the standard method derive the desired new build housing targets. The two approaches taken are the “growth scenario” which inflates the baseline and alternative demographic scenario, both of which point to around 57,000 new jobs / ~47,000 FTEs across the FEMA. With further analysis of what sectors will provide the FTEs and how much new floorspace is required as a result (allowing for a large number of other factors) it is possible to save the DLP from an overly large allocation of employment land ²⁴ but the effort to get there is tortuous and not at all convincing.
34. **Infrastructure:** Concerns about over-development naturally also focus on delivery of the infrastructure required to support such ambitious growth targets. A 30% increase in dwellings with a 10-12% increase in population would normally be expected to be accompanied by a 30% increase in the relevant infrastructure unless the starting point is infrastructure over-capacity.
35. Infrastructure needs to be broadly defined to have any utility in the context of a planned 30% increase in Dorset's housing stock. The definition must include (a) public transport (b) utilities (c) most public services - education, health, social services recreation and sports facilities, (d) easy to reach retail and hospitality.

²¹ D&BCP Employment 2024 7.33

²² D&BCP Employment 2024 6.31 and 7.9

²³ D&BCP Employment 2024 7.9 – which is broadly consistent with the figure in the 2021 Dorset Local Plan of ~21,000 new FTE 2018-2038 [DLP 2021](#) 2.2.9

²⁴ D&BCP Employment 2024 section 7 and Appendix 3

36. The DLP is relatively light on all of this except in the areas of transport where it can refer to the Dorset and BCP Local transport Plan (2026-2041) (“LTP2026”) which is well thought out and “vision based”. This document – also in consultation - takes full advantage of the freedom to be “evidence based” and flows from engagement which has elicited *“feedback from the public, stakeholders and partners to shape the plan and a new transport vision for our area and an understanding of the people, places and activities of our area to address local needs and priorities...”*²⁵
37. The LTP2026 notes a number of important points: (a) We will not expand the road transport network further unless directly linked to new large-scale developments. This is because future demand in these locations will result mainly from population growth facilitated by redevelopment within towns.²⁶(b) Public transport does not meet some people’s needs including frequency, affordability, and accessibility, particularly in rural areas²⁷, (c) Congestion is an ongoing problem across urban areas during the summer season and peak times of the day²⁸(d) among the main issues public transport suffers from lack of services within and between towns and villages and congestion making public transport less reliable²⁹(e) We are currently reliant on a combination of central government grants, developer contributions, and local funding, all of which can vary, making it difficult to guarantee sufficient resources.³⁰ and (f) key risks remain cuts to or a lack of available funding as well as cost escalation due to inflation or unforeseen circumstances.³¹
38. The LTP is sensibly divided into three implementation phases (LTP IP1 out to 2031; LTP IP2 out to 2036 and LTP IPT 3 thereafter to the end of the plan period) with prioritisation for LTP IP1 schemes based largely on the prioritisation criteria of available funding and reducing carbon footprint.³² The concern about visibility, predictability and quantum of funding is evident from Annex A of the LTP IP 2026 which sets out static estimated funding at ~£28m per annum through the IP1 period³³
39. Transport is the one area of infrastructure provision where there is enough detail to question whether the DLP is aligned with infrastructure planning. The LTP 2026 suggests that there will be common issues with respect to lack of certainty on and quantum of funding in other areas (health, social services, education etc.) which will compromise implementation by simply pushing an incremental burden on existing infrastructure, budgets and resources.
40. Secondly, the LTP 2026 shows that the impact of widely spread “flexible settlements” has not been anticipated or addressed specifically and depending on location may be inimical to the objective of reduce carbon emissions since the issues identified above (27) suggest these will be reliant on individuals’ motor vehicle transport. Expansion of

²⁵ Dorset and BCP Local Transport Plan (LTP) 2026 to 2041 draft August, 2025 p.6

²⁶ LTP 2026 p.5

²⁷ LTP2026 p.21

²⁸ Ibid p.21

²⁹ LTP2026 p.23

³⁰ LTP 2026 p.56

³¹ LTP2026 p.62.

³² LTP Implementation Plan 2026-2031 (Draft for Consultation) (“LTP IP 2026”) p. 10

³³ LTP IP 2026 p. 40

Tier 3 villages is particularly likely to contribute to increased carbon emissions given their more remote locations, distance from the nearest train stations and poor connectivity through public transport with the additional risks which come from overloading smaller country roads. Of the 53 Tier 3 villages listed in the DLP, 36 have low frequency (one service per weekday) bus services including 17 which have no service and 33 are greater than 10km from a train station.

41. Another supporting background paper for the DLP considers opportunity areas for renewable energy.³⁴ This considers sites which are broadly suitable for wind turbines, solar and battery storage taking into account “*wind speed and grid connection, and excluding areas of land with physical constraints such as built areas...[and] an assessment of landscape sensitivity*” but does note that further assessment is needed with respect to wind data, impact on National Landscapes, site specific features and aviation. The accompanying maps show that there is quite large and widespread potential for all three renewable sources across much of Dorset. However, it is odd that there is no mention in this document or in the DLP of the need to assess the potential social, economic and amenity impact of such developments associated with the withdrawal of agricultural land beyond “high grade agricultural land” which is to be excluded for solar developments.³⁵
42. The DLP’s efforts to plan for the full levels of infrastructure demanded, if only on an aggregate DC wide based, are meagre by comparison to the detailed LTP Strategy and IP1 plans. In Appendix A, the DLP outlines ~230 potential sites over 570 pages. Most of the non-transport infrastructure issues are assessed under the heading *Amenity, Health and Education*. In each case it makes some brief comments, generally on the first and the last of these concluding that there are “no major constraints/ issues or specific issues identified” in about a third of the cases, that provision for some educational facilities will be required in about a third and something else in about a third. Where provision for education is required (land/expansion funding), it is suggested that this will come at least in part from the development itself. This broadly implies that the costs of the infrastructure required by the proposed housing targets has not been examined in any detail.³⁶ On the other hand, this is also a likely by-product of trying to mesh a housing target build number with demographics which point the other way.
43. The application of the standard method to derive a new build housing target has left the authors of the DLP fearful of their ability to meet the new higher level of build, so much so that there is no evident concern of how to stimulate the demand for same. This fear is driven by NPPF paragraph 11, which specifies the LPA should grant permission in decision making if the LPA policies which are most important for determining the application are out-of-date. Out of date is defined as including situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was 25% below the housing requirement (i.e. target new build housing as

³⁴ Dorset Council Local Plan Options Consultation Appendix D: Opportunity areas for renewable energy August 2025 (“Appendix D”)

³⁵ DLP 14.5.2 p.74

³⁶ Dorset Council Local Plan Options Consultation Appendix A: Opportunity sites for housing

determined by the standard method) over the previous three years³⁷.

44. For Dorset, this means that if it cannot demonstrate at least ~7,500 new houses built over the first three years of the 2026-2043 period, it will have infringed the strictures of paragraph 11. There are exceptions to this rule including taking account of “*areas or assets of particular importance*” and “*key policies for directing development to sustainable locations*” inter alia. The authors of the DLP state (without citing evidence) that “*in the past, it has resulted in speculative planning applications for larger housing developments being submitted, and in many cases allowed, that are not consistent with the delivery strategies in the adopted local plans.*”³⁸
45. With this very thin justification, the DLP goes on to argue in favour of abolishing settlement boundaries and introducing the concept of “flexible settlements”. Paraphrasing, the rationale goes something like this: If DC cannot demonstrate new build housing of ~7,500 in each year to 2029, it may be forced to grant permission to new speculative developments by NPPF paragraph 11. Therefore, it is necessary to have a policy to approve speculative development in and around Tier 1-Tier 3 locations as this is the only means to avoid speculative development in and around Tier 1-Tier 3 locations. This is termed the Flexible Settlements Policy.³⁹
46. The real attraction of Flexible Settlements (or more accurately, the elimination of settlement boundaries so that Tier 1-Tier 3 sites can be made to accommodate incremental new build housing) is the potential for satisfying the rolling 3 year build test while larger developers debate the returns on bigger sites. In short, the phasing is beneficial to DLP now even if it means an opportunistic spread of new sites throughout Dorset which by definition must come forward without regard to infrastructure, transport, employment or any of the other plan considerations discussed above. The implication is that their sustainability is compromised regardless of whether they are labelled sustainable or not. If the demographics and commuting analysis holds then the primary targets for “flexible settlements” will be Tier 1-Tier 3 locations which can serve as dormitory towns for commuters to larger urban centres (e.g. BCP).
47. At best this is phasing of development which is likely to be inconsistent with the DLP vision of sustainability particularly with regard to the stated economic and environmental aims when it comes to Tier 2 and Tier 3 settlements. As noted, the policy is proposed to make up any deficit in targeted new build housing in the first few years of the plan until larger better planned sites which may be consistent with the sustainable aspects of the DLP vision can support the required new build housing target burden. The phrase “likely to be inconsistent” is used above because the DLP has not been able to identify any flexible settlement sites as yet⁴⁰ but wishes to encourage speculative proposals to come forward as a result of the proposed policy.⁴¹

³⁷ NPPF December 2024 PP11 p.6

³⁸ DLP 5.1.4 p.32

³⁹ DLP section 5

⁴⁰ Cf. DLP figure 4.1 p.28

⁴¹ DLP 5.3.2 p. 33 which also notes that sites of up to 30 houses are often brought forward by small/medium sized “local firms of builders”, citing NPPF PP73, which does not in fact comment on the locality of the builders, although it does emphasize that small-to medium sized sites are essential for SME Builders and

48. The Proposed Flexible Settlements Policy or the abolition of settlement boundaries seems entirely misguided in the context of the extensive 2021 consultation which resulted in a DC wide tiering of settlements, simplification and greater consistency in the establishment of settlement boundaries particularly with respect to the lower tiers where development outside the boundaries was then considered to be damaging to the expressed vision.⁴² At this time, the extensive consultation with Parish Councils and local bodies to obtain feedback on the proposed standardised tiering structure, the draft Local Plan was framed so that *“the settlement boundaries around Tier 1, 2 and 3 settlements are referred to as ‘Local Plan Development Boundaries’. As they have an important role in delivering a sustainable pattern of development, it is strategically important that they are retained. However, beyond the outer Green Belt boundary, when preparing neighbourhood plans, local communities can propose non-strategic amendments to the boundaries of Tier 1, 2 and 3 settlements to meet ‘local needs’, provided that the proposed amendments taken together would not promote less development than is set out in the draft local plan.”*⁴³
49. In essence, after extensive consultation 4 years ago, it was decided that “local needs” might dictate the relaxation of settlement boundary rules, whereas the current draft DLP proposes the abolition of settlement boundaries for all Tier1-3 settlements to ensure a targeted level of new build housing for supply to internal migrants.
50. The potential outcome here is that a Tier 3 village with a recognised settlement boundary today could be spared a major development but have 5 uncoordinated developments of 30 dwellings built sequentially which would be cumulatively equivalent to a major development. The only provision affecting this quantum of development is it would take place sequentially (which is in fact very similar to a major development being built and marketed in a series of phases which is how major developments are usually built and marketed). All this could occur even though the DLP recognises that the location involved is not suitable for large scale development (otherwise it would appear in DC’s list of locations suitable for large scale development).
51. It is not clear to what extent Flexible Settlements may cannibalise or be augmented by “windfall” development opportunities (which account for 7,000 new build houses in the DLP over the 2026-2043 period)⁴⁴. Minor windfall sites are currently defined as sites of less than 10 dwellings, normally in-fill within settlement boundaries, but with the abolition of these boundaries, more such sites might be presented, adjacent to or in between new flexible settlement sites. It is also not clear how Flexible Settlements will interact with former “rural exception” sites adjacent to villages and without the current settlement boundaries. When these latter are abolished under the proposed Flexible Settlement Policy, there is every opportunity for speculative new build to come forward, linking up with former rural exception sites (presuming they are no longer

“often built-out relatively quickly”. Without an adopted policy preference for Dorset based builders there is no real commitment to “buying local” here.

⁴² See DCLP-Jan-2021-settlement-hierarchy section 7 [DCLP Settlement Hierarchy](#)

⁴³ DCLP 7.2.6 p. 19

⁴⁴ DLP figure 4.1 p.28

exceptional) creating more opportunities for windfall sites in a manner which pretty much guarantees the sort of overdevelopment which settlement boundaries were intended to forestall.

52. For example, a new development next to a Tier 3 village in Purbeck, restricted to 15 homes under Policies H8 and H12 of the PLP adopted last year, could find itself adjacent to a flexible settlement proposed by the same developer giving the developer and opportunity to “come forward” with “windfall” of another 5-15 new build dwellings on the formerly restricted site and for which the more onerous H11 and H12 provisions on affordable housing have been superseded by the DLP.⁴⁵ In this way the developer gets permission for 30 or more houses on a site which has to date been restricted to 50% of that level.
53. Promotion of Flexible Settlements and support for windfall sites implies a relaxation of planning restrictions in the coastal areas of Dorset which are felt to suffer from high levels of second home ownership currently, thereby inviting new build which seeks out more second home demand. DC already has a double council tax policy on second homes but it may also require a primary residence policy akin to Policy H14 in the Purbeck Local Plan if it wishes to divert second homes demand away from the desirable coastal areas.⁴⁶ So far this is entirely absent in the DLP.
54. It is also unclear to what extent the Flexible Settlements Policy is in open conflict with the provisions of the 2024 NPPF with respect to National Landscapes, which is significant given the DNL covers ~40% of Dorset today and together with other National Landscapes about 60% of Dorset is within a National Landscape, including 17 of the 53 Tier 3 villages. The NPPF 2024 contains absolute strictures on major development within certain areas including National Landscapes⁴⁷ and acknowledges the constraints that the policies protecting National Landscapes (*inter alia*) impose on the LPA for plan-making purposes and decision making⁴⁸, yet the DLP still proposes all Tier 3 villages as suitable for Flexible Settlements. This seems to be against the general intent of the NPPF in this regard which enjoins the prohibition of such development unless it can be demonstrated that the benefits outweigh the adverse impacts.⁴⁹
55. The proposed policy inconsistency of abolishing settlement boundaries within the boundaries of National Landscapes (formerly AONBs) continues with examination of other relevant primary legislation including the Countryside and Rights of Way Act (2000) which notes that *“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of*

⁴⁵ PLP H8 p.87, H12 p.98

⁴⁶ Purbeck Local Plan H14 p.104

⁴⁷ NPPF 2024 section 190 p. 55, although there is wiggle room in that the NPPF devolves the determination of a major development to the “decision maker” which is presumably the LPA.

⁴⁸ NPPF PP 11 p. 6 – footnote 7 applies to both.

⁴⁹ Since this is the “presumption in favour” clause, the NPPF actually comes at it from the other direction noting that development should be granted unless certain policies (e.g. protection of National Landscapes) apply or the adverse impacts outweigh the benefit.

conserving and enhancing the natural beauty of the area of outstanding natural beauty.”⁵⁰

56. The proposed policy is also at best inconsistent with and possibly contrary to the Management Plan for the Dorset National Landscape 2018-2024 and the current draft Management Plan which is in consultation, both of which contain Policy C4a: *“Prevent and mitigate negative impacts of development on landscape and visual character affecting the National Landscape... Avoid and reduce cumulative effects that erode landscape character and quality. ...Avoid large-scale or high-density housing and employment development at settlement edges that weakens landscape quality....”⁵¹*
57. Another implication of this proposed Flexible Settlements policy is that it seems inimical to the promotion of affordable housing even if it is stated that it will assist in delivery of same. The DLP notes that *“Market led housing developments may not always deliver affordable housing in the locations where it’s most needed. We will therefore explore the use of an exceptions site policy to enable schemes for wholly affordable housing to be permitted on sites not allocated in the Local Plan, where there may be a particular need. This could apply across the whole of Dorset, be focused on specific ‘more sustainable’ settlements, or restricted to Green Belt locations only where the flexible settlements policy (in Section 5) would not apply.”⁵²* Flexible settlements are by definition market led, and if they are to fill the deficit in targeted new build housing in the initial period of the plan it, DLP has no current sight of where they will come and therefore whether they can address affordable housing need directly. The hoped for outcome may be that market led developments will produce enough CIL to eventually help fund affordable housing where it is needed, but without knowing the contribution it is impossible to test whether this is a feasible substitute to actual targeted and mandated build. Even if this process funds affordable housing it does so in a manner which appears to promote social segregation – market-led gated communities for some and CIL sites for others.
58. The continued integrity of the recently adopted (2024) Purbeck Local Plan is a further area of concern and the reader of the DLP searches in vain for comfort that the PLP provisions will be entirely respected.⁵³ The PLP is not mentioned directly in the DLP even where the relevant topic has been considered in some detail in the PLP. Section 13 of the DLP considers Strategic Heathland Recreation Mitigation⁵⁴ as does the PLP in Section 3⁵⁵ to substantiate the adopted policies E7 and E8. The DLP does not directly undermine these provisions – yet – but it does float the notion that any additional mitigation from smaller developments need not be on site in terms of new Heathland Infrastructure Projects (“HIPs”) but could be satisfied via unspecified enhancements to

⁵⁰ Countryside and Rights of Way Act 2000 S. 85(A1) as amended. S. 85(A1)(A2) was inserted (26.12.2023) by Levelling-up and Regeneration Act 2023 (c. 55) ss. 245(6)(a),

⁵¹ 2026-2031-DRAFT-Dorset-National-Landscape-Management-Plan. P.47; DAONB Management Plan 2019-24 p.91 Both plans recognise the national house building targets as a “challenge” to be faced by the DNL/AONB

⁵² DLP 4.4.6 p.30

⁵³ See also above [52]

⁵⁴ DLP Section 13 pp. 68-72

⁵⁵ PLP Section 3 PP 90-103

existing HIPs.⁵⁶ Since Purbeck is an area where heathlands are particularly prevalent (36% by area)⁵⁷, it will be critical to monitor how the friction evolves between new build housing and the preservation of the heathlands when residents might have considered this to be a settled matter just a year ago.

⁵⁶ DLP 13.2.6 p.71. The position put forward in the PLP is as follows: *“In circumstances, where there is an anticipated deficit in the quantities of mitigation for homes that are expected to be delivered during the interim period, the Council will seek to develop and deliver further heathland infrastructure projects as required.”* PLP PP 95 p. 47 (so “further” has been watered down to “enhancements of existing” in just 12 months)

⁵⁷ PLP PP 32 p.16

Responses to Questions in the Online Survey

Question 1: Do you have any comments on the proposed vision for Dorset?

- The vision as stated is ambitious and uncontentious - as a vision. Most visions are generally designed to be ambitious and uncontentious. The issues come where visions begin their translation into reality so as with any plan, they tend to come with proposals about execution, and not surprisingly that is the case with the DLP.

Question 2: Do you have any comments on the proposed strategic priorities for the Local Plan?

- The strategic priorities are individually fine strategic priorities. Hardly anything is missing except solving the issue of hunger everywhere in the world all at once. The issues come with respect to the weight given to some strategic priorities versus others and the resulting conflicts and inconsistencies. Stating that it is a strategic priority to address the declared climate emergency is *prima facie* in conflict with building anything or encouraging greater ecological footprint in anyway, so it is not surprising that the DLP proposes to mediate through mitigation, etc. This too is not unexpected but also shows that strategic priorities have a ranking which is not stated, with “growth” occupying most of the top ten positions as dictated by the Government.

Question 3: The proposed settlement hierarchy lists the towns and villages that will be the focus for new homes. Are there other settlements where we should plan for new homes? Do you have any comments on whether a settlement is in the right Tier or not?

- This question assumes that it is generally accepted that the settlements listed in Tier1-3 are suitable for further development. If the definition of “housing need” can change so dramatically over a 3 year period it should not be surprising that the definition of “suitable for development” should also change. It is not at all clear that the settlement hierarchy consulted on in 2021 in the context of the then applicable demographic and economic based definition of “housing need” is appropriate today. It is certainly not clear nor should it be assumed in the DLP that this is the baseline and other settlements should be added to the list. It is clear that the apparent conflict between the NPPF and the DLP created by the proposed abolition of settlement boundaries means that any Tier 3 villages in National Landscapes are not suitable for further development.

Question 4: Do you have any comments on the proposed strategy for the south eastern area ?

- The DLP implicitly recognises that the SE area is problematic for development – too much by the way of National Landscape, SSSI, SPSs, SACs – and as if that was not enough, there’s the issue of congestion today on the A31 which will only get worse unless there are improvements in public transport. The inability of the DLP to alleviate congestion on the A31 is laid bare in the DLTransportPlan IPT1 which shows the main project with respect to the A31 is one which will “*Support National Highways to develop a business case and secure investment to deliver capacity and safety improvements for vehicular traffic and walking and cycling and public transport at strategic junctions and sections along A31, and the local road network connecting to the A31. Work with National Highways to develop a scheme to support movements along the A31 and to support*”. That sounds a long way off and more or less

encapsulates the issue that development and infrastructure need to move forward in tandem, something which is far from clear in the DLP.

- Any development which relies on the A31 also appears to rely on road transport which is inimical to stated objectives with respect to reducing carbon footprint (part of the vision states *"We will reduce our carbon footprint and seek to enhance our natural environment."*).
- Apart from this, the broad strategy appears to be one of continuing the spread outwards from BCP into Dorset, with the focus for larger scale development in Wimborne, Blandford and Ferndown. What's missing from the strategy is any sort of comment about protections for the areas which are not to be the focus of major development.

Question 5: Do you have any comments on the proposed strategy for the central area?

- The strategy for the Central Area does appear to benefit from a more co-ordinated approach to development and. Infrastructure. The DLTransport IPT1 Plan discloses that virtually the entire focus in this area is on Dorchester-Weymouth- Portland corridor linking into the A31 (at which point visibility of achievable aims declines on the interface with National Highways). The major developments are North Dorchester and Crossways, with growth potential from the Dorset Clean Energy Super Cluster. On paper at least, it seems to make sense as an integrated strategy for growth, employment, development, and infrastructure.

Question 6: Do you have any comments on the proposed strategy for the northern area?

- The DLP strategy for the Northern area recognises the connectivity of the main centres here (Gillingham, Sherborne, Shaftesbury) with Yeovil and Exeter to the west, Salisbury and London to the east via the A303 and A30 as well as main line rail connections. These are therefore the natural foci for development under any strategy.

Question 7: Do you have any comments on the proposed strategy for the western area?

- The strategy for the Western area focuses on Bridport, Beaminster and Lyme Regis as the major centres which is logical. However, it fails in two areas (a) quantum, in that the strategy is one of over-development (particularly around Bridport) and (b) the lack of connectivity to other areas of Dorset let alone further afield. The DLTransport IPT 1 plan discloses nothing which suggests a radical step change in public transport delivery in the area so it is probably right to assume continued poor connectivity to other areas which make the area unattractive for economic development but attractive for tourism and recreational development. There is nothing in the strategy to provide the basis for the scale of development proposed for Bridport in the DLP. The strategy fails, on the grounds that it is not well linked to infrastructure or realisable economic development. A housing led strategy is likely to lead to second homes rather than addressing any local or internal migration need.

Question 8: Is there any important infrastructure that needs to be delivered alongside new homes in the Western/Central/South Eastern/Northern area?

- This is one of those questions where what is not asked is evidently more important than what is asked. There is an assumption that infrastructure needs can be funded

through development itself (as CIL). There is also an assumption that transport infrastructure needs will be met largely by central Government funding (the DLTransport Plan gives no sign of treating this as a given fact). There is an assumption that the resources needed to provide the broadly defined infrastructure required (transport but also schools, health, social services, leisure, hospitality etc.) will be available and can be attracted to the area. The conclusion is that all such infrastructure is important, and none of it currently evidences spare capacity, so all of it would need to be augmented (delivered), and potentially quite locally depending on where development is to take place.

Question 9: The Local Plan sets out a strategy to meet the area's housing needs through allocating sites for new homes, the flexible settlements policy, new settlements and the efficient use of land. Are there any other measures could help to meet housing needs?

- This is another poorly phrased question which does not provide the necessary context, involves a misplaced assumption and seeks to lead the respondent down an uncritical path. A more contextually accurate rephrasing would read: *"The Local Plan sets out a strategy to meet the new housing build target which the NPPF imposes on Dorset, through a variety of strategies which already compromise the strategies we have previously consulted on. Even so, it will be challenging to meet the targets on the timetable required of us. Are we missing anything which could help achieve such a challenging target?"*
- The annual new build housing target which the Local Plan is primarily concerned with has nothing whatsoever to do with the "area's housing needs". It is plainly a national requirement and the Local Plan is primarily focused on how to deliver the share which has been assigned to Dorset.
- The strategies outlined in the plan for attempting to achieve an impossible target are as comprehensive as they are undeliverable.
- The other contributing factor which the DLP does not include is the secondary market and particularly inheritance sales which could be significant in Dorset over then plan period. These will contribute to the satisfaction of housing need. However, since the Local Plan is not concerned with need but new build, it ignores this supply of housing.

Question 10: To what extent do you agree or disagree with the Plan including a lower housing target for the first few years and a higher figure towards the end of the plan period to meet housing needs?

- a. Agree
- b. Disagree
- c. I have another suggestion

- The DLP states *"It is likely that in the short term, the delivery rate will not be at the target..."* which is a bit of an understatement given the long-term average delivery of new build at ~1,600 units and the target is twice this, and general concerns that this new target will lead to considerable overdevelopment. A lower new build housing target in the first few years might give adequate space for the authorities to amend the provisions of the NPPF to ones which are more rational, more achievable and better correlated to demographic and economic development. So Yes a lower new build target would be sensible but not just for the first few years.

Question 11: Where should a policy allowing sites for only affordable homes apply?

a. All of Dorset

b. Only around those towns and villages listed in the proposed settlement hierarchy

c. Only in the Green Belt

- All of Dorset has a requirement for some level of affordable housing which could be addressed through allowing sites of affordable only homes, so the policy should be enabled across Dorset to allow flexibility. However, this should not be seen by developers as an excuse to establish market-led gated communities and separate communities for the less privileged through CIL funding for off-site affordable developments. The base case should be integrated sites. There are real doubts that the level of CIL will support adequate development of affordable housing off-site (since such development will not benefit from the synergies or common overheads of inclusion in a larger site)
- Overall section 4.4 is quite confused, evidencing the tension between a new housing build target and a bottom-up economic assessment of housing need for segments of the community.

Question 12: We have suggested that the Local Plan will not include clear boundaries to define the edges of towns and villages. Instead, the flexible settlements policy would allow new homes to be built around certain towns and villages. How much do you agree or disagree with this approach?

a. Agree

b. Partially agree

c. Neutral

d. Partially disagree

e. Disagree

Please provide any further comments or reasoning...

- Disagree. There is no option to say “strongly disagree” otherwise this would be the preferred one. The rationale is set out in some detail above [45] and following.

Question 13: We propose that the flexible settlements policy will include a limit of 30 homes per site. To what extent do you agree or disagree with this threshold?

a. The limit of 30 homes is about right

b. There should be less homes

c. More homes per site should be allowed

Please explain your reasoning

- Disagree. In fact the limit should be nil. There should not be any flexible settlements of any size. The DLP has produced no evidence to support the contention that the proposal of up to 30 dwelling on new flexible settlement sites will be built by local builders and only cites NPPF PP 73 which does not say this at all (it does say that delivery can happen more quickly and is an important size of build for SME builders, which is but a tautology since if they were Large Enterprises they would not be mainly building small and medium sized sites).
- This is another example of a poor question which tries to elicit a response without addressing the main issue. Please see above [45] and following which sets out the

concerns on the abolition of settlement boundaries to make way for flexible settlements.

Question 14: At a town/village, should one flexible settlement policy site be started, before another one is permitted?

a. Yes

b. No

Please provide any further comments

- No. The real answer is “Of course not !”. To allow multiple “flexible settlement” development sites to be built out at the same time equates to a major development divided into parcels of 30 dwellings or whatever number is determined. However, to allow multiple developments sequentially means prolonged development in parcels of 30 dwellings or whatever number is determined over a period of years. Which outcome is worse is the subject of a depressing debate.
- If a town/village is considered to be suitable for multiple flexible developments, why are the sites not included in the list of “identified large sites” ?
- The optimal outcome is to leave settlement boundaries as they stand.

Question 15: We have suggested that the flexible settlements policy will only apply to the areas around certain towns and villages, these are those ranked as ‘Tier 1, Tier 2 or Tier 3’ in our settlement hierarchy. What do you think about the locations where we have suggested that the flexible settlements policy should apply?

- The DLP seems to an exaggerated view of the ability of all the towns and villages listed T1-T3 to provide what could be described as sustainable development. Only those in T1 can reliably support additional development without relying on car transport and in fact many of those T1 developments would encourage additional car transport in any case.
- Tier 3 Villages are the ones which have the greatest need for settlement boundaries, since they can easily be swamped with over development given their size.
- It is important to remember that Tier 3 villages are not all equally capable of serving as a local service village. In the 2021 consultation, it was determined that six amenities were ideally required to evidence Tier 3 status, including a School; a Shop; a Meeting place (e.g. village hall); some Employment space; a Children’s play area or recreation ground; or a Doctor’s surgery, with a school and a shop being considered the most important. (DCLP-Jan-2021-settlement-hierarchy PP 7.7.3-7.7.4). In establishing the tiering it was considered that the village should have more than 500 inhabitants and any three of the six amenities. It stands to reason that having a school which generally comes with a playing field as well as a village hall does not mean that the village is ripe for over-development through abolition of its settlement boundaries.
- At the very least, the abolition of settlement boundaries for Tier 3 villages should be prohibited.

Question 16: We have suggested that the flexible settlement policy should only be applied around the ‘continuous built- up areas’ (i.e. ‘densely populated areas with high concentrations of buildings, infrastructure and paved roads’) of certain towns and villages. Do you have any comments on our definition of this ‘continuous built- up area’?

- (a) There should be no flexible settlements policy (b) the settlement boundaries which exist today adequately serve the purpose of defining a continuous built-up area so no change is needed and (c) settlement boundaries can be incorporated fully into whatever new policies.

Question 17: We have suggested that the flexible settlements policy should not be applied in the Green Belt. What are your thoughts on this?

- The disposition of the DLP against development within the Green Belt is welcome, but insufficient to protect Tier 3 villages in the same manner as settlement boundaries.

Question 18: Away from the towns and villages listed in the settlement hierarchy, there may be types of development that we could support. Do you have any comments on this approach and on the types of development that could be supported in the countryside?

- It seems sensible to focus on brownfield sites and urban intensification.

Question 19: We have suggested that the flexible settlements policy should not be applied in places with a recently made neighbourhood plan which includes allocations for new homes. What are your thoughts on this?

- Given that neighbourhood plans have been developed based on a more rigorous assessment of local needs than a compulsion to meet a top-down build target, neighbourhood plans (and the PLP) should take precedence in all respects over the application of DLP policies.

Question 20: The Local Plan will retain and protect existing key employment sites, identify new employment sites at locations close to more sustainable settlements, allow for expansion of existing employment sites and allow for new employment sites in suitable locations. Do you have any comments on this approach?

- The DLP promotes an employment site strategy which is out of synch with the housing growth strategy. The reason for this is that it intends to rely too heavily on “flexible settlements” rather than “sustainable settlements” since the DLP is not confident about the ability to deliver the new build housing target on the required (or any) timetable. Ideally, new employment sites are proximate to existing locations and sustainable developments but allocation should wait until it is clear (or not) that the new “sustainable settlements” can actually be delivered. The DLP recognises this may take quite a few years so the ability to assess whether employment and housing can be developed in tandem is on a similar timescale.

Question 21: The Local Plan will enable employment land to be developed outside identified sites at certain towns and villages, subject to certain considerations. Do you agree with this approach?

- The question is badly phrased if this a truly a consultation where decisions have not been made in advance
- A brief layman’s paraphrase of DLP PP 6.4 is *“If we embark on “flexible settlements, housing development will be market-led and we have no idea where or when or how much housing will be developed as a result. For this reason, we may need to rethink where employment sites are allowed, otherwise allowed employment sites might sit far*

away from the housing we have already permitted. Therefore, it might be sensible to have a flexible employment site policy along-side the flexible new build housing policy”

- Recognising that the DLP is overly dependent on potentially unattainable “sustainable settlements” to deliver the quantum of housing required by the standard method’s derived build target, the DLP has searched for yet more flexibility to propose employment locations where they might not be suitable but would make the numbers add up. While reuse of sites - brownfield - is a sensible condition, the notion that building in unsustainable sites is an acceptable policy is dubious and risks the creation of “white elephant” sites scattered through the county.
- The answer to the question must be no, not least since it is impossible for any sane individual to assent to a flexible settlement policy with or without an accompanying flexible employment sites policy which together deliver totally unplanned over-development.

Question 22: We have suggested that larger scale housing sites should be required to provide land for employment uses. Proposals for 300 homes or more would be mixed residential and employment developments, with a ratio of 0.25ha of employment space for every 100 homes. How much do you agree or disagree with this approach?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning...

- Agree - mixed use seems to work well and is efficient in terms of infrastructure development. However, this is one area where flexibility may be important so setting a rule of 0.25ha of employment space for 100 homes seems inadvisable unless it is a guideline with considerable variation allowed to go higher or lower depending on the specific circumstances of the site.

Question 23: We have suggested that the Local Plan should include policies to protect the most important existing ‘key’ employment sites.

- a) Do you have any views on the strategy we have suggested for protecting employment sites?
- b) What criteria should we consider when defining ‘key’ and ‘non- key’ employment sites?
 - a. Site size
 - b. Location
 - c. Contribution to meeting economic objectives/needs
 - d. Employment use type
 - e. Accessibility
 - f. Market attractiveness
 - g. Opportunities for growth/expansion
 - h. The site’s status in previous local plans
 - i. Other

- While the DLP (PP 6.6.2) states that employment sites may come under pressure for change of use (which might greatly assist meeting the new build housing target) it does not present any evidence of this threat existing. Given the DLP’s focus on

compromising other areas to meet the new build housing target one might expect the DLP to welcome this threat, despite the stated implications for employment (which are not detailed).

- Given the above the answer to (a) is that if there is a real threat which in turn has real consequences for employment opportunities, the measures should be taken to ensure that the DLP does not over-prioritise a new build housing target which jeopardises the real economy.
- In answer to (b) it does not make sense to define a category of “key” or “non-key” employment sites since each will be exceptional in its own right.

Question 24: How do you think we should plan to support town centres in the future?

- n/a

Question 25: What types of use do you think will be most important for the future of our town centres?

- a. Shops
- b. Cafes/restaurants
- c. Leisure (e.g. cinemas)
- d. Offices
- e. Cultural (e.g. museums)
- f. Community (e.g. libraries)
- g. Hotels
- h. Other...

- It is increasingly important that town centres are walkable and provide a sense of community. While larger retail sites are less and less able to fulfil the needs of residents and residents of those smaller settlements which gravitate to the orbit of towns, hospitality and cultural sites are the main attractions which sustain the towns in relation to the other settlements in the vicinity.

Question 26: We are suggesting that retail impact assessments should be undertaken for retail development proposals outside the town centres defined in the Plan, that are over the size of a small food store (280 square metres net). How much do you agree or disagree with the introduction of a threshold of 280 square metres for retail impact assessments?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning

- Disagree.
- One size fits all rarely works and does not make sense in this case. These issues should be considered on site-by-site basis. It seems disproportionate to require a retail impact study for any retail development over 280sqm as many other factors will be reflected in the overall impact than can be estimated by footprint alone. Additionally, sites may become available which are larger than 280sqm where less than 280sqm would be utilised at first, allowing for same site expansion.

Question 27: Should the threshold also apply to leisure uses that are net 280 square metres? Yes/No

- No. And there should be no arbitrary threshold

Question 28: We are considering whether the Local Plan should include a policy which supports interim or temporary uses pending a permanent use for a vacant town centre building - we have called these 'meanwhile uses'. To what extent do you agree with the introduction of a meanwhile uses policy?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning

- Permitting meanwhile uses is very sensible since it gives businesses / entrepreneurs / artists an opportunity to test a business model often at free or discounted rental and sustains the vibrancy of a locale while more permanent solutions are sought.
- Allowing meanwhile uses also enables locales to better appreciate what they risk losing if they do not support local businesses and eschews the risk of a dead-zone developing while the "perfect solution" awaits.

Question 29: How else can we encourage development on brownfield land, whilst also planning positively to meet our needs for homes and employment land?

- Brownfield sites should automatically enter DC's brownfield register when the use which caused the previous development ceases and the associated structures are dismantled or removed, unless the owner specifically requests otherwise on grounds that the land in question is being restored to nature, agricultural land, or recreational land (e.g. park, playing field) in which cases the land should be so designated in perpetuity.
- There should be a presumption in favour of development for any brownfield site.

Question 30: To what extent do you agree with taking land out of the Green Belt to help meet our development needs?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning...

- Disagree. In broad terms the Green belt should be untouched.
- However, it is possible to agree that Grey Belt Land should be examined for development purposes as long as there is real clarity that such development does not diminish the overall benefit of the Green belt and reduce it progressively so that over time an entire Green Belt area is downgraded to Grey Belt.
- Clarity on the regulations governing the designation as Grey Belt - including proximity to other potential areas of Grey Belt within the same Green Belt - are essential.

Question 31: We have suggested that the Local Plan should include a flexible settlements policy which would allow new homes around certain towns and villages. What impact, if any, do you think the proposed flexible settlements policy might have on opportunities for self-build homes?

- a. High impact
- b. Some impact
- c. No impact

Please provide further comments or reasoning.

- Flexible settlements” is a disastrous policy suggestion which should not be pursued.
- If it were pursued it would destroy opportunities for self-build by offering the greater probability of achieving a higher target new housing build through medium sized sites and so would always be preferred to self-build. It would squeeze out self-build, but this would perhaps be its least damaging characteristic.

Question 32: Is there anything else we should do to increase the supply of self- build plots?

- No

Question 33: We have suggested that housing requirements for neighbourhood plan areas should be finalised at the next stage of preparing the Local Plan. This is likely to involve consideration of sites with planning permission, local plan allocations and unplanned development. To what extent do you agree or disagree with the proposed approach?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning...

- Disagree. Anything which suggests targets for new build housing should be avoided.

Question 34: Should the housing requirement figures for neighbourhood plan areas outside the Green Belt, include an allowance for sites that could come forward through the flexible settlements policy?

- a. Yes
- b. No

Please provide any further comments or reasoning.

- As noted previously under Question 19, given that neighbourhood plans are evidence based while the DLP is top-down target based, neighbourhood plans should always take precedence over the DLP.
- Ideally, the flexible settlements policy is abandoned so nothing comes forward under it.

Question 35: We have suggested that our Local Plan objectives for Travellers should be:

- to reduce the numbers of unauthorised sites,
- to provide opportunities for sites to expand,
- to encourage new Traveller sites in sustainable locations, and
- to provide opportunities for Travellers to deliver their own sites.

Do you have any comments on the objectives for meeting the need for Traveller sites?

- Eliminating unauthorised sites is a worthy ambition, and travellers should be encouraged to come forward with their own sites subject to planning and authorisation.

Question 36: To help ensure that enough pitches are provided to meet Dorset's needs, Traveller pitches could be delivered alongside homes for the settled community on large scale residential development. Are there any issues which you think we need to consider in locating Traveller pitches alongside new built homes for the settled community?

- No.
- By definition, travellers do NOT want to be part of any community so pitches should be kept away from existing and new build homes.

Question 37: We are suggesting that 5 Traveller pitches should be provided for every 500 homes on large development sites. Is this threshold correct?

- a. Yes
- b. No- it should be higher
- c. No- it should be lower

Please provide any further comments or reasoning.

- C. It should be nil. Travellers are by definition not interested to be part of the community and should be pleased to sit outside it in every respect.

Question 38: To encourage Travellers to deliver their own sites, we are suggesting that the Local Plan should include a criteria policy which takes account of the site's location, access, neighbouring development, environmental impact and management of the site. Do you think we need to add or change any of the suggested criteria?

- The "criteria" listed are general categories for consideration and not criteria per se.
- There should be some well well-defined criteria, but these are not they.

Question 39: We have identified opportunity sites which could deliver more homes to help meet Dorset's housing needs. Do we need to change the approach to mitigating impacts on protected Dorset Heaths habitat sites as part of planning to meet increased housing needs?

- a. Yes
- b. No

Please provide further comments or reasoning.

- Yes.
- Clearly with greater numbers of homes and occupiers there will be more pressure on Heathlands alongside other habitats so more stringent protection measures will be required.

Question 40: To what extent do you agree or disagree with development at Shapwick to enable the delivery of public benefits from investment in the Kingston Lacy Estate?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning

- Agree

Question 41: We have outlined some areas which could be appropriate for wind turbines, ground mounted solar panels and battery energy storage. To what extent do you agree or disagree with identifying broad areas of opportunity for wind, solar and battery energy storage?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

Please provide any further comments or reasoning.

- Partially agree:
- No one size fits all and renewable energy installations should be considered on a site-by-site basis, with some governing guidelines such as size, output, and benefit to nearest local communities which lose amenity, as well as taking note of Section 85 of the Countryside and Rights of Way Act (updated 2023)
- The DLP should be very careful about approving solar farms as solar technology is rapidly improving in terms of gain and developments which will allow greater solar capture in standard building materials (roofs, windows, even cladding) for houses. This will enable the capture of much more power than is possible from the current standard 14Kw domestic array and go much further to creating sustainable housing with delivery direct to the domestic consumer. This also implies that all new “sustainable settlements” should be mandated to maximise available solar generation and provide centralised storage facilities (shared battery sites) for blocks of up to 100 dwellings.
- Solar energy development should be prioritised and is best incorporated into planned housing development rather than looking for dedicated sites for ground mounted solar arrays which should be avoided as they lead to lost agricultural land at a time when climate change makes long term judgements about the grading of agricultural land very complex and a poor measure of the land’s utility over time (e.g. a lot of non-prime agricultural land in Dorset is now planned for viniculture).
- The DLP’s proposed sites for small and medium scale ground mounted solar arrays are over ambitious and needlessly intrusive (e.g. they appear to include large parts of the Jurassic coastline, including the army ranges as well as the Fleet and the entire eastern end of Chesil Beach (appendix D p.9))
- Wind energy on a lifetime cost basis (including manufacture and salvage at end of life) is environmentally net negative and should be avoided.

Question 42: Since Roman times, the centre of Dorchester has had a prominent position in the landscape. One of the threats to this identity is at the eastern edge of the potential development area (near the A35). Would you support keeping this eastern area more green and open, even if that means fewer homes, facilities and jobs?

- a. Agree
- b. Partially agree
- c. Disagree
- d. Partially disagree
- e. Neutral

Please provide any further comments or reasoning...

- What Dorchester really needs is reinvigoration of a depressed town centre which has been impoverished with the development of Poundbury. Regeneration and enhancement of Town Centres is much more important and should be prioritised over new build. On this basis, question 42 is off the mark.
- However we broadly agree that the eastern (as well as Northern, Western and Southern areas) should be kept green and open even if that means fewer homes, facilities and jobs.

Question 43. Supporting jobs, homes and services all in one place is an essential part of the health of a town. Do you see new workspaces that are integrated into walkable neighbourhoods and local centres as an attractive part of Dorchester in the future?

- a. Agree
- b. Partially agree
- c. Disagree
- d. Partially disagree
- e. Neutral

Please provide any further comments or reasoning...

- Partially agree. Walkable is good, supporting jobs, homes, services, motherhood and apple pie is good. New development is not required to achieve this

Question 44: We believe that the valley at Pigeon House Farm can play an important role in encouraging access to nature and celebrating local landscape — What type of development, if any, do you think could help support this in a sustainable way?

- i. A smaller scale of development
 - ii. A larger scale of development
 - iii. The use of the area as an undeveloped landscape buffer, for recreation,
 - iv. A mixture of the above
- education and nature interpretation, without any housing development.

Please provide any further comments or reasoning...

- If Pigeon House Farm is to contribute to any “celebration of the local landscape” it can best do so by remaining an undeveloped landscape buffer without housing development

Question 45: What are your priorities for a new east-west route?

- Thinking 🤔

Appendix 1: Population Growth and Housing Stock

The introduction of a housing supply target which is not evidence based causes many issues not least in terms of reconciling the resulting outputs to official demographic statistics.

Based on ONS data (and estimating the data for the period 2000-2020 before the establishment of the Unitary Authority so that one can see a historical trend) it seems that either (a) the average number of residents per dwelling will sharply reduce if ONS population data is at all accurate (see Appendix 1 Chart below from current projection of 1.93 per dwelling to 1.74 under the DLP) or (b) the population will grow by more than expected if the average number of residents per dwelling maintains the current trajectory. The latter would make more sense but implies a net increase in the Dorset population of ~47,000 (+12.4% or 472,000 vs. current ONS forecast of 425,000) by the end of the plan period. However, this extra growth would need to be reflected in longer term infrastructure planning, which it is not currently.

Appendix 1 Chart

