

## **General response text for Local Plan**

### **2 Vision and Strategy**

#### **2.1 The Local Plan Vision**

##### **Q1 Do you have any comments on the proposed vision for Dorset?**

We applaud the aims expressed in the vision, but the detail of the proposed opportunities for housing development ignores this vision. Almost all of the proposed sites for Colehill are within the Green Belt. The lack of sustainable travel is an issue with every proposed site in Colehill, which makes the aim “with sustainable travel opportunities provided to them from surrounding villages” unachievable.

We see these aims to be paramount: “The character of the rural areas will be maintained and enhanced where opportunities arise. The area’s rich heritage, hedgerows, trees and the character of the landscape will be respected where development takes place. The large areas of significance for biodiversity will be protected and real enhancements to the natural environment will be realised, guided by the Local Nature Recovery Strategy.”

But the suggested large-scale additions to housing in Colehill would ride rough-shod over these aims and obliterate much of the natural environment and landscape.

Protection of important biodiversity should be a fundamental consideration in site selection. We have real concerns that the approach of assuming that mitigation is the enabler of all development is both problematic and unsound. The disjointed, incremental approach of ongoing gnawing into the Green Belt is highly likely to impact substantially on our surviving open grasslands and habitats for carbon storage/biodiversity, whittling them down to strips of land or annihilating them altogether - destroying the green corridors so valued by our residents.

Previous plans have always regarded these green corridors as having a crucial function. Have less damaging options been investigated sufficiently?

LP 3.2.9 promotes a questionable axiom about new towns – that ‘Due to the scale of the development being considered, it is likely to be at least 10 years before any new homes are delivered.’ But there is a counter argument that new towns are more sustainable in the long term than piecemeal extensions to existing infrastructure. The new town route should not be rejected out of hand.

#### **2.2 Strategic priorities**

##### **Q2 Do you have any comments on the proposed strategic priorities for the Local Plan?**

We believe that the priorities have been presented in the wrong order. First should come ‘Communities for all’ – sustainability of communities is the bedrock for a successful development of a ‘Grown economy’ - which then requires ‘Provision of homes’. Indeed this is supported by LP 2.2.5: “The Local Plan will enable communities to thrive...”, which correctly emphasises sustainability of development.

Physical constraints must also play a defining part in development plans. Colehill has a very specific issue with flood water control, borne of its natural topography.

It is a fact that surface water runs off built development much more quickly than undeveloped land, such as permanent grass land. Prevention of flash flooding is one of the most important ecosystems that natural habitats, such as grasslands, provide. Replacing them with hard surfaces is already a major cause of flash flooding in the local vicinity and of more frequent and higher flooding episodes further down the system.

Sustainable Draining Systems (SUDs) are undoubtedly helpful and important, but they are but local mitigation for a very serious problem.

When development is placed on hillsides, such as those in Colehill, the flash flooding issue is exacerbated – yet the Plan includes several steep hillsides in its selection process. This is a questionable choice at a time when climate change is resulting in increased rainfall.

Lower levels, such as those earmarked for development at LA/COLE/004,017,033, currently provide water soakaways for the upper reaches of the village and its forestry.

Much is made in the Plan of areas at risk of flooding, and SHLAA contains details of necessary mitigation or development restriction, but these are on a piecemeal approach for individual sites and do not address the cumulative effect of the loss of significant tracts of grassland across Colehill.

### **3 The strategy for sustainable development**

**Q3 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?**

We object strongly to the pairing of Wimborne Minster and Colehill as if they are a single Tier 2 entity. The two settlements have radically differing topographies, histories, ecologies, and feel. Colehill was, traditionally, larger in population, area and domestic rateable value than Wimborne Minster until the transfer of land to Wimborne Minster and its subsequent development as WMC 7 and 8 in the Community Governance Review of 2014.

#### **3.3 South Eastern Dorset area**

**Q4 Do you have any comments on the proposed strategy for the south eastern area?**

We are concerned that there is something fundamentally wrong about the way in which the Local Plan is being formulated. It is expressed simplistically in numbers of generic homes, rather than specifying the size or type of house. The local plan should be a plan to accommodate the population living here (at a level of detail that includes those who require affordable housing; families with children; those who look after children; older people; students; people with disabilities; service families; travellers; people who rent their homes; and people wishing to commission or build their own homes; an ageing population, and the health and mobility issues which come with that), and those we want to attract.

LP 3.3.4 is particularly disturbing. It promotes release of Green Belt as being the help that is needed to meet the needs of the area. Whereas we need first to make local plans for sustainable communities and lay the ground work for their implementation.

LP 3.3.1 is true

“There is significant demand within the area for additional employment space and homes. The

affordability of housing is a major issue.”

as is LP 3.3.2

“Much of the area is extremely environmentally sensitive, with many areas having multiple habitats and species, as well as landscape designations. The South Eastern functional area supports significant areas of national and international importance for nature conservation, notably the Dorset heathlands and including Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. This restricts the suitable land for development and places mitigation requirements on the development that does take place.”

LP 3.3.4

“However, traffic congestion is a major issue despite the A31 trunk road running through the area. This means that encouraging a shift to active forms of travel and public transport is important.”

But we do not see credible options suggested in the Local Transport Plan. And while the simplistic planning approach is retained, it is transportation that has to bridge the gap between housing provision and the true needs of population.

### **3.7 Infrastructure Delivery**

#### **Q8 Is there any important infrastructure that needs to be delivered alongside new homes in the Western/Central/South Eastern/Northern area?**

Infrastructure improvements must include:

- a) Implementation of the eagerly awaited Dorset Design Code
- b) Strategies locally for location of medical centres, doctors and dentist surgeries, pharmacies, community centres, shops, recreation
- c) Strategies for road network improvements – the Transport Plan refers to using existing roads more efficiently – but without convincing arguments about how this is to be achieved
- d) Sewerage reinforcement outline plans
- e) Surface water drainage outline plans – with calculations double checked
- f) Highways planning capability at county level increased so that traffic safety measures can be promptly implemented
- g) Building inspectorate officers numbers increased
- h) Compliance and Enforcement officers numbers increased

Regarding e) above – we see an immediate need to carry out a fundamental strategic flood risk assessment of the entire Southeast Dorset area – updating earlier assumptions and data.

We need to ensure that NHS Dorset Integrated Care Board make appropriate allocations to Colehill.

## **4 Housing Delivery Strategy**

### **4.2 Local Housing Need and Housing Delivery**

**Q9 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 that could help to meet housing needs?**

The order of thought in LP 4.2.3 is incorrect – infrastructure and environment are the key requirements, within which housing may be planned.

LP 4.2.12 is important – and we hope that the Dorset Design Code may help to deliver this: “optimising levels of development on sites in the most sustainable locations by setting housing density requirements through planning policies. This approach would need to ensure that development still responds to the character of the area”.

### **4.3 Housing supply**

**Q10 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?**

Check a. = Agree

Acceleration to the centrally imposed targets is impossible in the time frame allowed – and impossible targets dishearten those engaged in the projects.

Use the ramp up period to implement feedback monitoring of key measures – eg housing market parameters – prices and costs; employment opportunities; transport planning; housing demand parameters – in case national trends turn out not to apply locally.

And the new Standard Method is not necessarily the true required method.

In any case, large scale step function increases in housing and population present challenges to community cohesion.

### **4.4 Meeting housing needs of specific groups**

**Q11 Where should a policy allowing sites for only affordable homes apply?**

Check a. = All of Dorset - if a check is required

We do not agree with this policy. Rather, we hope that the Dorset Design Code will emphasise that the affordability of a particular dwelling should not be physically apparent – the affordability should be encapsulated within the financing arrangements of the occupants – no more significant than ‘which mortgage deal you are on’. Indeed it should be possible for a dwelling to move between market value and affordability.

We agree that “we need to update the local housing needs assessment to understand what this means for the needs of current and future residents in Dorset so that we can plan for the correct size, type and tenure of new homes”, and very definitely (LP 4.4.3) “We will need to refresh the evidence that informed the approach in response to the new housing targets. This will include consideration of the need for accessible homes, the need for care and nursing homes and the need for affordable housing.”

## **5 Flexible settlements policy**

### **5.2 Proposed approach – Flexible settlements policy**

**Q12 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?**

Check c. = neutral

No comment

### **5.3 The scale of development**

**Q13 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?**

Check a. = about right

No comment

### **5.4 Number of sites at each settlement**

**Q14 At a town/village, should one flexible settlement policy site be started, before another one is permitted?**

Check a. = yes

Ideally, a settlement should be completed before another is permitted.

### **5.7 Green Belt**

**Q17 We have suggested that the flexible settlements policy should not be applied in the Green Belt. What are your thoughts on this?**

LP 5.7.1: we agree with “This is because national policy indicates that new buildings in the Green Belt are generally inappropriate, as they fail to maintain its openness and prevent urban sprawl.”

### **5.8 Approach to countryside development and urban intensification**

**Q18 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?**

Countryside development should be the very last option, and only after strict application of good planning practice.

Agricultural worker houses could be possible in small scale developments on village boundaries to enable use of existing facilities and link to services.

## **6 Employment Strategy**

### **6.3 Employment allocations**

**Q20 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?**

Existing employment should be retained.

New employment opportunities with local journey distances and times should be encouraged.

LP 6.3.3 – “To meet future need, the Dorset Council Local Plan will also identify sites as new employment allocations. These areas will be primarily reserved for offices, research and development, industrial processes and storage and distribution” - but we also need space for local services – medical centres, doctors and dentist surgeries, pharmacies, community centres, shops, recreation.

### **6.4 Employment development away from allocated sites**

**Q21 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?**

Wherever possible, employment sites and services should be integrated within the community in order to reduce journey times and associated pollution and congestion.

### **6.5 Mixed use development**

**Q22 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?**

Check a. = agree

Services and employment should be planned within or close to housing developments, thereby providing sustainability and reduction of travel requirements.

### **6.6 Protecting employment sites**

**Q23a) Do you have any views on the strategy we have suggested for protecting employment sites?**

We agree with LP 6.6.2 “Existing employment sites may come under pressure for change of use to non-employment uses. The loss of employment sites can reduce local job opportunities and impact negatively on economic competitiveness, potentially undermining economic growth.”

The LP suggestion that the site COLE/028 be developed for housing is directly contradictory to LP 6.6.2.

### **Q23b)**

Key sites may be small, but can be highly significant at local level.

- a) **Site size - no**
- b) **Location - yes**
- c) **Employment use type - yes**
- d) **Accessibility - yes**
- e) **Contribution to meeting economic objectives/needs - yes**
- f) **Market attractiveness - yes**
- g) **Opportunities for growth/expansion - no**
- h) **The site's status in previous local plans - no**
- i) **Other - none**

## **7 Town centre development**

### **Q24 How do you think we should plan to support town centres in the future?**

We need to generate demand for services, attract staff to run the services and places for those staff to live – without unnecessary travel distances – and sufficient car parking for customers of the services.

To support this, we need accommodation for (mostly young) people who could work in the distributed centres' retail and hospitality facilities, without having to travel in from outside. One bedroomed apartments/studio apartments as upper storeys for shops.

Provision of sites for emergency services. In particular the police service should have a publicly accessible presence.

### **Q25 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...**

Check a, b, c, d, e, f, g. = Shops, Cafes, Leisure, Offices, Cultural, Community, Hotels(B&B)

## **7.2 Managing town centre development**

**Q26 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?**

Check d. = partially disagree

280 sq m is too small (it is the size of small shops - such as One Stop/Spar) – we need fewer barriers to establishment of retail, not more.

We suggest that discounts on commercial rates should be given to start ups.

**Q27 Should the threshold also apply to leisure uses that are net 280 square metres?**

Check a. ie Yes

**Q28 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?**

Check b. = partially agree

No comment

## **8 Brownfield Land**

### **8.3 Brownfield land delivery**

**Q29 How else can we encourage development on brownfield land, whilst also planning positively to meet our needs for homes and employment land?**

The CPRE produced (September 2025) a report which analyses brownfield land availability with excellent detail: “An updated analysis on the potential of brownfield land for housing”. We support its recommendations - brownfield sites should always be considered before any attack on contributors to biodiversity and the Green Belt.

Existing thriving businesses should never be threatened by this policy.

## **9 Green Belt review**

### **9.2 Our approach to Green Belt release**

**Q30 To what extent do you agree with taking land out of the Green Belt to help meet our development needs?**

Check e. = disagree

We oppose any programme of Green Belt de-classification which has targets measured in house building area terms. Every package of land removed from Green Belt protection is just another chip taken out of the vast natural heritage of which we are privileged to be the current custodians.

## **10 Self build & custom build**

### **10.3 Self-build plot delivery**

**Q31 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?**

Check b. – some impact

Such building within the Green Belt should not be allowed.

**Q32 Is there anything else we should do to increase the supply of self-build plots?**

No comment

## **11 Neighbourhood plans**

### **11.3 Housing requirement figures for neighbourhood plans**

**Q33 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?**

Check b. = partially agree

Proper planning application submission and consideration must still be applied.

## **12 Traveller requirements**

### **12.3 Strategy for meeting Traveller needs**

**Q35 We have suggested that our Local Plan objectives for Travellers should be:**

- a) to reduce the numbers of unauthorised sites,**
- b) to provide opportunities for sites to expand,**
- c) to encourage new Traveller sites in sustainable locations, and**
- d) 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?**

It is key that consultation is carried out with the gypsy and traveller population to ask them what they want/need. Just allocating numbers of pitches to developments over a given size will not work – we have to work with the community.

"Kicking the Can down the Road" report from 2023 recommendations will be useful.

Perhaps developing "negotiated stopping" sites (referenced in the report) and having a regional approach working with neighbouring counties.

**Q36 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?**

A very strange suggestion. It is instinctively wrong to assume that Travellers have the same requirements as settled population.

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

Yes ☐

No-it should be higher ☐

No-it should be lower – check this one

**Please provide any further comments or reasoning.**

This metric is ill advised. See Q36 above.

## **13 Strategic Heathland Recreation Mitigation**

### **13.1 Background**

**Q39 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?**

Check b. = no

LP 13.1.8 suggests that a strategy for and provision of HIPs / SANGs is effective and deflects recreational pressure from the heaths.

We agree that SANGs can be a method by which housing plans and retention of important biodiversity can be mutually achievable within a development plan. Biodiversity needs protection and long-term maintenance including keeping it in its natural context (complete with wet flushes and seepages).

We have suggested in our response to individual opportunity sites, that some of the land should actually be allocated to extension of existing SANGs - such as Bytheway Field in the Leigh Basin.

## **14 Onshore Wind, Solar, and Battery Energy Storage**

### **14.2 Identifying suitable areas**

**Q41 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?**

No comment