

DRAFT CVPC RESPONSE TO DORSET COUNCIL'S LOCAL PLAN CONSULTATION

GENERAL COMMENTS

The Consultation Document

For consultation purposes the document is far too long and hard to navigate.

There are confusing repetitions between introduction, strategic aims and more detailed policies. This is undemocratic because there is no way the public, and particularly those without internet access, can absorb and respond to a document of this magnitude and complexity.

Future consultations should provide a clear summary, and/or be in the form of a series of consultations on separate topics. An index might help.

This is particularly important because the Govt is proposing a complete overhaul of the national planning system which would give even greater importance to Local Plans and make full public consultation even more necessary.

The effects of Brexit and Covid 19 are still unknown and will need to be taken into account. The plan does not adequately respond to the ever-increasing influence and importance of IT and associated infrastructure.

The plan will also need to incorporate the content of the forthcoming Environment Bill.

Enforcement

CVPC is concerned that the plan is useless without adequate enforcement and questions whether DC resources are adequate to provide it. An increasing number of developments are carried out without planning approval on the assumption that a retrospective application will succeed. This practice shows contempt for the planning system which depends on approval before development starts. CVPC suggests a presumption of refusal for all retrospective applications.

Scope of Plan.

This plan, by its very nature, is reactive, rather than proactive ie it is all about responding to applications within the current levels of service provision. In spite of various statements of "vision" there is an inevitable absence of positive policies.

MAJOR ISSUE 1

THE FUTURE OF SETTLEMENTS IN TIER 4

There needs to be a positive statement that DC wants Tier 4 settlements to remain as active and viable communities for those who work in the countryside or choose to live there.

We believe the LP should be based on accurate up-to-date information about existing employment in villages. Survey work is urgently needed to provide the necessary data before the plan is finalised.

For this, CVPC suggests some modest additions to the list of developments which can be considered in the rural area (see Policy DEV 7, Page 38)

Second homes

CVPC supports the suggestion in para 4.7.1 Page 152 that changes in Council Tax rather than LP policies are probably the best way to reduce demand.

MAJOR ISSUE 2

THE RELATIONSHIP BETWEEN TOURISM, RURAL LIFE AND THE ENVIRONMENT.

Tourism is a major issue particularly along the coastal strip and its hinterland. It obviously brings huge economic benefits but can be harmful to the environment, the road system and rural life. There is a danger that the tourist pressure destroys the very attractions the visitors come to enjoy. CVPC believes that all applications for further tourist development should be more rigorously assessed in terms of their impact (including their cumulative impact) on local infrastructure particularly roads and drainage. We support policy ECON 6 page 202, but feel it needs to be more rigorously applied in future. This applies particularly to new campsites in the countryside (Policy ECON 8 page 207), where there can also be an issue of enforcement. (see above)

MAJOR ISSUE 3

ACCESS AND TRANSPORT.

The limited road system and lack of public transport are major factors in the life of Tier 4 areas. The A35 is becoming more and more congested, particularly in the holiday season, and rural lanes are unsuited to increased traffic. Any road 'improvements' risk damaging the quality of the AONB which draws holiday-makers to the area.

These issues can only be tackled by a district-wide Transport Strategy which pays attention to the needs of rural areas. It is essential that such a strategy is agreed before the Local Plan is finalised.

MAJOR ISSUE 4

Use of the Community Infrastructure Levy

CVPC would like to see a policy allowing CIL funds from larger schemes (eg Vearse Farm) to be used in tier 4 areas when a specific need has been identified by the relevant PC. (eg for bus shelters or improvements to insulation or heating in existing buildings such as village halls, or improved access to the services which have been drawn away from rural areas and into these larger conurbations by the attraction of larger developments)

DETAILED COMMENTS

(Where no comment, agreement can be assumed)

Introduction

1.3 1 Climate Change and Biodiversity. The plan mentions adaption and mitigation. Why not prevention/reduction? Need to be more ambitious.

1.3.3. Add words "heathlands and permanent grasslands" after "protecting trees and forests"

3. 14.1

Covid 19 is currently making public transport unpopular and this needs to be taken into account. It cannot be assumed that this and the expected influx of "staycationing" visitors is a temporary phenomenon. Congestion on the A35 particularly in the holiday season, is increasing journey times and reducing quality of life for residents. In this respect the plan is out of date.

1.3.19 More data is needed, since COVID may be increasing numbers of working-age people moving to Dorset to work from home and so reducing the expected increase in elderly households.

P 12 1.3.22 Economic Issues

The data seems weak, more work needed.

CVPC objects strongly to the wording "Lower-skilled occupations like farming..." This seems to show a lack of interest in or knowledge of agriculture.

Better to say poorly-paid occupations, as elsewhere in the plan.

2. Development strategy

Introduction

2.1.1. Definition of "sustainable" Do we agree? Is "growth" essential?

A lot depends on accessibility which is not addressed in the plan.

2.1.2

Sustainable Development Objectives

Environmental: Again, aim should be to prevent/ reduce extent of climate change, as well as "mitigate and adapt".

Economic: again, do we need physical "growth"?

Social: CVPC supports "Delivery of homes to meet Dorset's actual needs (I e not Govt assessment based on national formula).

2.1.4

Vision:

Too vague. Needs of rural areas need definition.

Strategic Priorities:

"Climate etc" rightly in first place." Define "ecological net gain"

CVPC supports mention of renewable energy, reduced travel, minimised energy use. Add creation of green jobs? (eg in upgrading insulation and heating in existing buildings)

Reverse decline in biodiversity in general, not just protected species.

Economic Growth

Does the Dorset Council area need 21,00 new jobs? The plan needs to make the case. Unique environment "Natural capital value") seems to be valued solely for its contribution to the economy.

Suitable Housing: replace "including affordable housing "with "particularly affordable housing."

Support the aim to meet the needs of those who wish to live and work in the area, but not necessarily those who want second homes (see discussion at para 4.7) There is a need to resist the imposition of Govt housing land targets based on national formula.

Staying safe and Well "The terms "High quality, well-designed "are subjective. Who decides?

2.2. It seems that the definition of Dorset's "Housing Need "is determined according to the Govt's Standard methodology which is currently being revised. Both housing numbers and the housing

land requirement are therefore subject to change and consultation must be regarded as premature.

2.3.10 Settlement Hierarchy.

2.6.22 DEV 7

(see MAJOR ISSUE 1 above)

DEV 8 Re-use of existing buildings

This amounts to considering applications on a case by case basis, which seems reasonable.

P54 There is no employment land allocation in any of the Tier 4 settlements. The nearest are at Beaminster and Bridport (4ha at Vearse Farm) There is little evidence of “need”. More work is needed.

P61 ENVIRONMENT AND CLIMATE CHANGE

Policies are confusing and overlapping although some, such as “Green corridors”, are good. This section is weak, mostly aspirational rather than practical. There is a lack of positive policies. No mention of opportunities for green jobs. The plan needs to be more ambitious. There is no sense of urgency re climate change. Mitigation and adaption are not sufficient. The plan should also aim for reduction and prevention.

P64 ENV 1 laudable aims

P76 ENV 2 Vii Heaths and permanent grassland need to be added to this policy on trees and hedgerows.

P77 BIODIVERSITY and NET GAIN

The mitigation hierarchy seems to expect failure to protect. This s a defeatist policy.

P77 Biodiversity net gain is a suspect term. Biodiversity relates to the whole natural world, not just protected species. These policies are likely to be overtaken by the forthcoming Environment Bill.

P 83 ENV 4

The Vearse Farm approval demonstrates the ineffectiveness of AONB status and all the environmental policies in the Plan.

3.8 “High quality” is a subjective term

ENV 10. WE welcome mention of intrusion from artificial lighting schemes. This should be more strongly worded in the form of a Dark Skies policy.

P 125 ENV 14 should be applied even on small inland sites where there is, or may be, greensand.

P133 CVPC supports the Strategic Priority “to enable those who grow up in Dorset to stay in Dorset”

P142 Paras 4.4.5, 4.4.7and 4.4.8 .CVPC supports these policies for affordable housing on rural exception sites.

P143 HOU 3 CVPC agrees with this policy

P 152 4.7.1 See Major Issue 1

HOU7 Housing for Rural workers and H8 Occupational Dwellings. These appear to be the same as in the previous LP and are broadly acceptable.

HOU 9 iii, page 163/4, seems to make it more difficult to build ancillary residential accommodation than under the current WDDC Local plan. CVPC welcomes the change.

5.8.3 CVPC welcomes recognition that tourist-related development takes place in a sustainable manner... while avoiding adverse impacts on the local environment or existing infrastructure.

ECON 6 CVPC supports this policy, particularly sections Xii, and Xiii.

ECON 8 CVPC supports this policy.

COM 7, 8 and 9, p 240 need to take more account of the need for public transport in rural areas. See Major comments 4.

COM 12 page 252. Broadband. This policy needs strengthening in respect of rural areas.