

## Charmouth Neighbourhood Plan – Dorset Council Comments

### Introduction

This document sets out Dorset Council comments on the Charmouth Neighbourhood Plan Submission Draft (Regulation 16 – May 2021). This is a combined response with comments from both the Council’s Community Planning and Conservation Team’s. This response considers the extent to which the Plan complies with National Policy and Guidance (primarily the National Planning Policy Framework 2021) and is in general conformity with the strategic policies of the development plan for the area (the adopted Joint West Dorset, Weymouth and Portland Local Plan 2015). The neighbourhood plan should also contribute to sustainable development and be compatible with EU obligations including the SEA Directive of 2001/42/EC.

Dorset Council has actively engaged with Charmouth Parish Council throughout the preparation of the Neighbourhood Plan. This engagement has helped to shape the Plan and as such this representation mainly contains commentary on the Plan where Dorset Council considers issues remain but is supportive of approaches where appropriate.

### Revised NPPF 2021

On the 20 July 2021 a new National Planning Policy Framework (NPPF) was published replacing the previous revised NPPF 2019. The policies in the Framework are material considerations for the examination as transitional arrangements set out in Annex 1, paragraph 220 do not apply. It is however acknowledged that the Charmouth Neighbourhood Plan was prepared and submitted in the context of the revised NPPF 2019 and before the NPPF 2021 was published. Nevertheless, we advise that references to the NPPF 2019 should be updated throughout the Neighbourhood Plan. Identified references:

- Paragraph 2.1, bullet point 1.
- Paragraph 6.6 quotes paragraph 173 which is now paragraph 178.
- Paragraph 6.7 quotes paragraph 11 (wording taken from paragraph 14 of the NPPF 2012 and would need updating).
- Paragraph 6.11 quotes paragraph 172 which is now paragraph 176.
- Paragraph 6.43 quotes paragraph 174 which is now paragraph 179.
- Paragraph 6.75 quotes paragraph 180 (wording taken from paragraph 125 of the NPPF 2012) which is now paragraph 185. The first speech mark should move to the beginning of ‘limit’.
- Paragraph 8.13 states paragraph 61 which is now paragraph 62.
- Paragraph 8.14 references paragraph 63 and 77 which are now paragraphs 64 and 78.
- Paragraph 8.16 references paragraph 62 which is now paragraph 63.
- Paragraph 8.18 reference paragraph 71, 77 & 57 which are now paragraphs 72, 78 & 58.
- Paragraph 8.29 references paragraph 122 d) which is now paragraph 124 e).
- Paragraph 8.31 refers to paragraph 77 which is now paragraph 78.

- Paragraph 8.32 refers to paragraph 125 which is now paragraph 128.
- Paragraph 8.34 refers to paragraph 130 which is now captured by a re-worded paragraph 134.
- Paragraph 10.7 quotes paragraph 8 c) which has received minor revisions.
- Appendix A: glossary of terms
- Appendix B: abbreviations

### [Plan Period](#)

Dorset Council support the proposed Plan period 2021 – 2035 on the front cover of the Plan which offers a 14 year time horizon. We note that the Appendix A: glossary suggests an alternative plan period of 2020-2031 and advise this discrepancy is resolved.

### [Maps](#)

In earlier drafts of the Neighbourhood Plan, Dorset Council had expressed concerns with the pixilation of some of the maps. The updated maps within the Plan are now considered clear and legible for readers. The map appendix is also a welcome addition as this document provides the precise boundaries of all the place-based policies at a higher resolution.

### [Protecting our heritage and history](#)

The Council’s Conservation Officer has been consulted and provides the following comments.

In general, it is welcomed that the plan engages with the historic environment in the following broad areas: providing a general historical context for the NP area; summarising the Conservation Area Appraisal; having a heritage-related policy to shape development (Policy HH1); and in identifying non-designated heritage assets.

I have had a look through and I can see that they have incorporated almost all my suggestions made at Regulation 14 stage and so I don’t have any further substantive comments to make on the submission version. The only element which appears not to have been taken up is my suggestion of a more extensive search for non-designated heritage assets within the whole NP area (rather than just the CA), e.g. the sections of Old Lyme Hill I mentioned. However, this is not essential as the revised policy wording now better covers heritage assets and, like national policy, leaves the door open for others to be identified.

As previously advised, some possible further non-designated heritage assets within the NP area suggested themselves from our visit:

- the two arms of the former turnpike road to Lyme Regis (Old Lyme Hill – identified as ‘monuments’ on the Dorset HER (MWX78); and
- Several surviving sections of possibly medieval burgage plot boundary walls (e.g. Devonedge Lane, Barrs Lane and wall along E boundary of Greenstead, Barrs Lane). Others may survive and are together and individually highly significant for illustrating the early settlement pattern, particularly in combination with the surviving N boundary wall along the rear of the burgage plots.

[Policy HH1: Heritage Assets](#)

Dorset Council support the intention of Policy HH1 and welcome table 4.1 which lists seven locally identified ‘Important non-designated Heritage Assets’ including an asset description. Map 4.3 is also helpful in depicting the location of the non-designated heritage assets.

[Protecting our Assets and Amenities](#)

[Policy AA1: Important Community Assets and Amenities](#)

We welcome table 5.1 which lists 17 ‘locally Important Community Assets and Amenities’ including a justification.

Dorset Council support the aim of Policy AA1 in seeking to retain important community assets and amenities by allowing them to modernise and adapt. Given the tightly drawn boundary of Charmouth there may be scenarios where their relocation outside the neighbourhood area can be considered provided the new location is appropriate to its function and the community it serves.

[Protecting our Natural Environment](#)

[Policy HRA1: Habitats Regulation](#)

The Habitats Regulation Assessment screening exercise concluded that there were likely significant effects as a result of the Charmouth Neighbourhood Plan due to Pollution to groundwater (point sources and diffuse sources), human intrusions and disturbances, and urbanisation, industrial and similar activities at the Sidmouth to West Bay Special Area of Conservation (SAC).

Dorset Council supports Policy HRA1 which is required in order to prevent an adverse effect on the integrity of the Sidmouth to West Bay SAC.

[Policy NE1: Landscape](#)

Dorset Council supports the intention of this policy and particularly the cross reference to table 6.1 which lists the ‘Distinctive Landscape Characteristics of Charmouth Parish’ which have been evidenced.

[Policy NE2: Views and Vistas](#)

Dorset Council supports the aims of Policy NE2 to protect those views and vistas which are available to all. We welcome table 6.2 which identifies 9 ‘locally important views’ and their description / reason.

[Policy NE3: Biodiversity and Natural Habitats](#)

Dorset Council supports the Plan’s aim to protect aspects of the natural environment by ensuring that all development is sustainable and welcome the amendments made to the policy text reflecting earlier comments made at Regulation 14 consultation.

[Policy NE4: Local Green Spaces](#)

Dorset Council supports the aim of Policy NE4 to protect identified local green spaces from inappropriate development. We welcome Table 6.5 that identifies 15 ‘Proposed Local Green Spaces’ with reasons for their importance which is in turn supported by The Green Audit and Local Green Spaces Report.

Following receipt of a letter from the National Trust dated 26th June 2021, regarding the designation of LGS2, we understand that the Steering Group of Charmouth Neighbourhood Plan would like to amend the LGS2 map to reflect the land owned by the National Trust. Dorset Council would fully support this change if the Examiner was minded to accept this amendment. The revised area can be viewed within both the National Trust and Charmouth NP steering group representations.

[Policy NE5: Lighting](#)

Dorset Council supports the aims of Policy NE5 and the balance it seeks to make between, too much light resulting in light pollution and too little causing safety concerns.

[Policy NE6: Pollution](#)

Dorset Council is supportive of the Plan’s aim to “minimise pollution and its environmental impact, from any source, for the benefit of health and well-being for everyone, whether residents, other locals, or visitors, for now and the future.”

Policy NE6 bullet point 2 requirement for noise assessments for residential or noise sensitive development in proximity to the A35 is considered to be in general conformity with Local Plan Policy ENV16 and the Council’s ‘Planning Application Requirements’ (April 2019).

[Policy NE7: Land Instability and Geology](#)

Policy NE7 is supported.

[Supporting our local economy](#)

[Policy BET1: Charmouth's Retail Hub](#)

Dorset Council is supportive of the Plan’s aim to support the protection of existing retail properties as shown on the retail hub map 7.1. Charmouth is not identified as a Local Centre in the adopted local plan (either within paragraph 4.4.4 or glossary under ‘local centres’) or the Joint Retail and Commercial Leisure Study (2018).

Policy ECON4 criterion vi) of the adopted local plan discusses residential development above shops but this criterion is considered non-strategic.

[Policy BET2: Economic Development and Premises for New Businesses](#)

Dorset Council is supportive of Policy BET2 which seeks to encourage growth of new businesses while protecting the village’s special character and its surrounding landscape.

The strategic approach set out within Policy ECON1 criterion i) of the adopted local plan includes the general support for employment development within or on the edge of a settlement, there are no size restrictions. The Neighbourhood Plan recognises that there are limited opportunities in Charmouth and therefore where new buildings are proposed, the premises are to be small in scale (100sqm or 1076sq.ft), the equivalent of 2 storey’s in height and restrictions applied to prevent further conversion to non-employment uses. The definition of small scale (100 sqm) limit is considered particularly restrictive and it is recommended that this definition should be increased to refer to schemes of up to 500sqm to align better with permitted development rights (for example Class I).

Although this policy is considered overall to be more restrictive than Policy ECON1 criterion i) the Council is content that the final paragraph of Policy BET2 bullet point 3 allows for larger buildings under exceptional circumstances, if it is considered that there are significant benefits to the village community.

#### [Policy BET3: The Reuse of Rural Buildings and Land for Employment Use](#)

The re-use of farm and rural buildings outside the defined development boundary for small-scale business purposes is support. Adopted Local Plan Policy SUS3 ‘Adaptation and reuse of buildings outside defined development boundaries’ is considered non-strategic.

#### [Creating Homes for Charmouth’s Needs](#)

##### [Number of Houses Required](#)

Dorset Council is content that paragraph 8.7 is a true reflection of estimated local housing need emerging from the Dorset Council Local Plan – Options Consultation (January 2021).

Appendix 2 of the Local Plan sets out a draft housing requirement for 54 homes between 2021 – 2038. As at April 2020 there were thought to be 12 extant permissions combined with a windfall allowance of 42 dwg. 3 dwg per annum for the remaining 14 years of the Plan, excluding the first three years of the 17 year plan period to avoid double counting extant permissions.

Feedback from Charmouth Parish Council during the consultation has however identified four double counted permissions we accept as errors in the draft Plan. Therefore the number of net housing units from extant approvals is 8, not 12, and consequently Charmouth’s minimum 15 year housing requirement is 44 dwg ie 8 (extant) + 36 (12 years x 3 pa). We have assumed the Neighbourhood Plan period runs from January 2021 to December 2035 rather than April to April in the Local Plan.

#### [Policy H1: New Housing Developments](#)

Dorset Council understands that the aim of this policy is to support the development of new small houses on small scale sites primarily inside the Defined Development Boundary, to continue Charmouth’s historic pattern of organic, small scale growth (paragraph 8.12). Paragraph 8.9 explains that there is some limited scope for small scale infill, redevelopment and sub-division of larger plots if of sensitive design and appropriate density. The Neighbourhood Plan glossary defines small homes as having 1 to 3 bedrooms.

Bullet point 1, Dorset Council is concerned that bullet point 1 may be considered unnecessarily restrictive as Local Plan Policy SUS2 ii) states that residential development will normally be permitted. There are no limits of plot size for example. Local Plan Policy HOUS3 Housing Mix states that residential development should include a mix in the size of, type and affordability of dwellings proposed. The Strategic Approach refers to the type, size and mix of housing being expected to reflect local needs as far as possible and result in balanced communities, as reflected in Policy HOUS3, so it is a strategic policy.

Neighbourhood Plan paragraph 2.8 offers some flexibility by clarifying the word ‘should’ has a specific meaning in allowing the applicant some flexibility where they “consider that there are good reasons why their proposal cannot meet the policy requirements, they should explain this as part of their application, and show how they have aligned with that policy’s intention as far as possible.” Within this context there may be scope to include such a restrictive policy approach locally.

Bullet point 2 allows for “rural exception sites for affordable housing up to a maximum of 20 units per site must adjoin the Defined Development Boundary and form a logical extension to this Boundary and must not represent a marked intrusion into the countryside.” Local Plan Policy HOUS2 however permits ‘small scale’ sites adjoining settlements. A 20 unit limit could be considered reasonable in the context of Charmouth’s size and could be in general conformity with policy HOUS2.

Bullet point 3, Policy ENV15 and Paragraph 2.6.18 of the Adopted Local Plan encourages the re-development of brownfield sites if they are not of high environmental value.

Bullet point 4, Dorset Council supports the reference to local housing needs evidence to steer future housing size, type and tenure as well as housing mix. Starter Homes have been replaced by First Homes, however, Neighbourhood Plans are subject to transition periods. It would be helpful if the Neighbourhood Planning Group could clarify their intention in this regard and remove all references to starter homes throughout the Plan, although curiously the NPPF 2021 has not replaced Starter Homes itself.

#### [Policy H2: Affordable Housing](#)

Bullet point 1, Dorset Council welcomes Charmouth NP identifying the local housing need priorities. Reference to ‘Starter Homes’ can be removed.

Bullet point 1, The Ministerial Statement (24 May 2021) states that “A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes.” Planning practice guidance (Paragraph: 015 Reference ID: 70-015-20210524) clarifies “Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.” In practice this means that First Homes will be prioritised over other forms of affordable housing. Although it is recommended that bullet point 1 be re-ordered to reflect this national policy position with First Homes listed first, the issues raised in our response to Bullet Point 3 may

mean that this is not the best solution and that a cross reference to the Government’s First Homes policy maybe more effective. For example, “Where there is discretion within the Government’s First Homes policy, the housing need priorities in the Charmouth area are in descending order:”

Bullet point 2 is considered to be in general conformity with Local Plan policy HOUS 1 which seeks 35% affordable housing in West Dorset. Charmouth is located in the Dorset Area of Outstanding Natural Beauty (AONB) a designated rural area. Planning practice guidance (Paragraph: 023 Reference ID: 23b-023-20190901) clarifies that “In designated rural areas planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold”

In August 2016 West Dorset District Council agreed to apply changes to the threshold. This means "officers normally applying or recommending the application of the thresholds in national policy and guidance below which affordable housing should not be sought, including officers applying, or recommending the application of, a different threshold in 'rural areas' described under Section 157(1) of the Housing Act 1985". In designated rural areas, a tariff-style contribution towards the provision of affordable housing, where a housing development of 6 to 9 homes (net) is proposed. In this context Dorset Council is supportive of seeking a lower threshold in Charmouth where justified.

Bullet point 3, states “Exceptionally, starter/first and market homes up to a maximum of 20% each type and a combined total of 30% of the total number of units on each rural exception site can be considered where they are essential to a scheme’s viability.” The Ministerial Statement (24 May 2021) clarifies that “the Government has decided that in designated rural areas [As set out in Annexe 2 of the National Planning Policy Framework], which includes some of the more constrained and expensive regions of the country such as National Parks and Areas of Outstanding Natural Beauty, rural exception sites will remain as the sole exception site which can come forward. Elsewhere, First Homes exception sites and rural exception sites can both come forward.” Charmouth is located within the Dorset AONB.

With reference to Rural Exception Sites, paragraph 78 of the NPPF 2021 states “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

The NPPF, Annex 2 Glossary defines Rural exception sites as “Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.”

In this context, it is not precisely clear how the Government’s First Homes policy interacts with Rural exception sites. It would seem that the local community could choose to prioritise other forms of affordable housing beyond First Homes the Government’s stated priority. This could mean that there is a need for two priority lists for housing in Charmouth; a first list for all housing sites within development boundaries and a second priority list for rural exception sites? As this seems overly burdensome the bullet point 1 list could be supported subject to an additional criterion that cross referenced the Governments First Homes Policy.

Bullet point 4, Dorset Council suggest some flexibility is built into this approach rather than ‘capped’.

Bullet point 5, Dorset Council is supportive.

Bullet point 6, Dorset Council is broadly supportive of the aims of this criterion. Preference is for marketing to run for 4 weeks. The definition of a ‘Charmouth Connection’ is set out in Appendix A: Glossary of the Plan. Although the definition is broadly in line with the Dorset Council definition of a local connection there are slightly differences which for consistency the Council would like to see amended. These differences included adding ‘or 3 years out of the last 5’ to the definition of permanent residents. Removing the requirement for those young adults that reach the age of 18 to have lived in the parish for the proceeding 10 years. For those in employment, removing the break in contract clause. Removing the requirement for a descending order of priority. The Council’s preferred solution is for a cross reference to the Council’s standard definition of Local Connection. This is set out in the Councils Housing Allocation Policy 2021-2026.

Bullet point 7, Dorset Council is supportive.

#### [Policy H3: Benefitting from New Housing](#)

Bullet point 1, Dorset Council notes the policy approach to restrict new homes under a principal residence condition however, the Council considers that unintended consequences could result from such a policy approach. For example, the policy could put increased pressure on the existing housing stock being bought and used as second homes. Such unintended consequences should be fully considered.

Bullet point 2, states that “future extensions which create habitable rooms proposed for housing built after 2020, either on rural exception sites (both affordable and any starter/ first or market homes) or on affordable homes within the Defined Development Boundary, will be restricted.” to the allowance under Permitted Development in designated areas. Dorset Council is concerned that the proposed approach is unnecessarily restrictive, particularly the restrictions that relate to market housing.

#### [Policy H4: Housing Form and Layout](#)

Dorset Council is supportive of the Plan’s policy focus on “managing density and massing impacts of new build, re-developments and extensions, ensuring that they respect the building

line and complement their neighbouring properties and the immediate locality.” (Paragraph 8.29)

Bullet point 1, Policy would benefit from supporting design evidence such as a place appraisal to help the decision making with interpretation of its rural village and coastal characteristics.

Bullet point 2, Dorset Council welcomes the local definition of ‘immediate locality’ within the supporting text paragraph 8.29 and Glossary of terms.

Bullet point 3, agree.

Bullet point 4, agree.

Bullet point 5, agree. Dorset Council welcome the further clarification in the supporting text paragraph 8.30. This bullet point could include the word ‘should’ given paragraph 8.30 refers to should in numerous places.

Bullet point 6, agree.

Bullet point 7, agree.

Bullet point, 8. Dorset Council is concerned that this criterion is unnecessarily restrictive. Policy approach conflicts with Policy SUS2 ii) which states that “within DDBs residential, employment and other development to meet the needs of the local area will normally be permitted”. Government policy allows for extensions to properties to allow for people to live in their own homes in changing circumstances. NPPF 2021 paragraph 124 states planning policies and decisions should support development that makes efficient use of land. Paragraph 125 states that it is especially important planning policy and decisions avoid homes being built at low densities and ensure that development make optimal use of the potential of each site.

Bullet point 9. Dorset Council is concerned that this criterion is unnecessarily restrictive. Policy approach conflicts with Policy SUS2 ii) which states that “within DDBs residential, employment and other development to meet the needs of the local area will normally be permitted”.

#### [Policy H5: Housing Design](#)

Dorset Council supports the aim of this policy to encourage good quality, innovative and sustainable design which incorporates local distinctive features which will enhance the street scene (Paragraph 8.36).

#### [Getting around Charmouth](#)

##### [Policy GA1: Pedestrian Routes](#)

Bullet point 1, Dorset Council welcomes reference to a map 9.1 of existing and closed footpaths.

Bullet point 2 -6, Dorset Council support the aims of each of these criteria.

##### [Policy GA2: Car Parking](#)

Bullet points 1 & 2, Dorset Council is supportive.

Bullet point 3, the proposed approach varies from the standard methodology set out in the Bournemouth, Poole and Dorset Residential Car Parking standards. To justify a higher standard detailed local evidence and justification should be provided. Examiners of other neighbourhood plans in Dorset have not considered it appropriate to deviate from the Dorset wide residential car parking standards.

#### [Energy efficiency and coastal change](#)

##### [Policy CC1: Energy Efficiency](#)

Dorset Council support the aim of this policy is to ensure that development is achieved with the least possible negative impact on the environment by minimising carbon release and maximising energy efficiency.

Paragraph 10.9 of the NP usefully summaries some of the measure Dorset Council has recently taken in relation to climate change including the declaration of a climate change emergency.

##### [Policy CC2: Coastal Change and Flooding](#)

Dorset Council has significant concerns with Policy CC2 and its supporting text in relation to its interpretation of the Shoreline Management Plan and its support for coastal defences rather than coastal change adaptation.

##### [Neighbourhood Plan Position](#)

Paragraph 10.16 of the NP explains that the current ‘Durleston to Rame Head Shoreline Management Plan’ (SMP2) states that from 2025 i.e. in the medium and long term: “There would be a move towards No Active Intervention along the cliffed (sic) western part of Charmouth (with) Managed Realignment within the River Char, through providing set-back flood defences as it becomes increasingly technically difficult to maintain defences in the existing position.”

The NP summarises the report’s conclusion under two bullet points.

- a) no protection is proposed for Charmouth foreshore area (No Active Intervention) in the medium/long term i.e. the existing coastal defences will no longer be maintained after 2025, and when they fail, will be removed
- b) there may be some form of protection developed up-river (Managed Realignment) which should protect riverside properties and which might in time protect some of the lower part of the village from flooding.

Paragraph 10.16 notes that SMP2 is not statutory and its conclusion that “it is technically difficult to maintain defences in the existing position” should be open to reconsideration.

Paragraph 10.24 lists some of the direct effects and losses at the foreshore. Paragraph 10.25 also notes the “loss of tourist facilities and thus a significant drop in tourists would have a serious impact the economy of the village and the local area.” Paragraph 10.26 concludes “In view of the considerable difficulty in identifying suitable sites to relocate some of the shoreline facilities which have to be by beach, the priority for Charmouth has to be serious improvement

to the coastal defences.” Paragraph 10.24 warns that “The future of the village and its economy has a major dependence on the existence and serious improvement or replacement of the coastal defences in the short, medium and long term, before they fail and the damage cannot be undone.”

Paragraph 10.36 sets out the Plans hope “to protect Charmouth and its economy by ensuring that the effects of coastal erosion are minimised or are delayed for a considerable period through serious improvement to the coastal defences.” Paragraph 10.38 concludes “The village is unlikely to have a sustainable future without serious and prompt attention to the issue of coastal defences. SMP2 does not restrict the possibility of improving coastal defences prior to 2025.”.

In this context bullet points 1 of Policy CC2 seek to “To safeguard the long-term future of the village and its economy, any engineering initiative to significantly improve the existing coastal defences or to create new defences as soon as possible will be supported, providing there is no significant negative impact on the coastal environment and processes.” Paragraph 10.39 summarises the position arguing that “once foreshore assets are unable to be used the prospect for Charmouth’s economy will have a significant negative impact. Therefore, the priority should be to explore improvement to coastal defences prior to considering relocation. While relocation of some of the foreshore assets may be possible it will never fully mitigate the overall loss to the economy. This issue is of such significance to Charmouth and the surrounding area that it requires action.”

#### [Dorset Council Position](#)

Dorset Council has concerns over the NP’s draft policies and proposals in respect to this section of coastline. National planning policy requires plans to reduce risks from coastal change by avoiding inappropriate development in vulnerable areas (paragraph 171 of the NPPF). National policy goes onto state that areas which are likely to be effected by coastal change should be defined as Coastal Change Management Areas (CCMA) and that plans should:

- a) ‘be clear as to what development will be appropriate in such areas and in what circumstances; and
- b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas’ (Paragraph 171 of the NPPF).

The council has sought to identify CCMA on the policies map of the emerging Dorset Council Local Plan. The council has followed direction in planning practice guidance which states that:

‘Local planning authorities should demonstrate that they have considered shoreline management plans, which provide a large-scale assessment of the risks associated with coastal processes, and should provide the primary source of evidence in defining the coastal change management area and inform land allocation within it.’ (Paragraph: 072 Reference ID: 7-072-20140306)

The council has also taken account of specific coastal risk planning guidance prepared for the former West Dorset District Council which is also relevant to this section of coastline. The shoreline management plan is neither legislation or adopted planning policy – despite this it carries significant weight as a material consideration when preparing planning policy and taking decisions on planning applications. The emerging policies in the NP (to maintain defences along this section of coastline) appear to be inconsistent with those in the shoreline management plan and out of step with the main thrust of national planning policy which is: to avoid inappropriate development on land at risk from coastal change and to make provision to relocate development from areas at risk from coastal change. In the absence of strong evidence to support and justify those emerging policies in the NP the council is concerned that these proposals and policies are not likely to meet the basic conditions around consistency with national planning policy/guidance, a potential conflict between these proposals and policies and the council’s emerging planning policies in the Dorset Council Local Plan and lack of clear justification for the proposals/policies.

In practice, we have been advised that coastal defences are an unrealistic option as there is currently no funding available now or in the foreseeable future, costs for any defences are in most instances prohibitive and even if funding could be secured, any planning application would receive strong objection by national environmental bodies and likely be refused. Even if funding and planning permission could be secured, any measures would be short lived as the sea would simply cut around the edge of any defence leaving an exposed armoured hard point. There has been a recent review of Shoreline Management Plans nationally and no change to this approach has been recommended, so this position is considered up to date. Community groups are instead encouraged to start with the premise that coastal erosion will happen and that community efforts should seek to be pro-active in the preparation of adaptation planning. Adaptation plans are a separate project that looked to proactively relocate buildings and infrastructure inland before the sea damages or takes these facilities. Using Charmouth as an example, the relocation of the car park or visitor centre could be usefully considered.

### Recommendations

The council has some more specific comments on the parts of the emerging policy:

Bullet point 1, Proposals to maintain or enhance existing defences would be inconsistent with the management policies in the shoreline management. This bullet point should be deleted.

All references within the supporting text that are inconsistent with the Shoreline Management Plan should also be deleted. The Council would highlight the final sentence of paragraph 10.16, paragraph 10.26, the first sentence to paragraph 10.36, the final two sentences of paragraph 10.38 and the whole of paragraph 10.39. Reference to a future Coastal Defence project in paragraph 10.40 should also be considered for removal.

Bullet point 2 supports the relocation of coastal premises and services subject to or damaged by coastal change or flooding will be supported if there is no prospect of future improvements to coastal defences to safeguard the premises, and to an appropriate location suitable for purpose.

The council supports this part of the policy which seeks to make provision to relocate infrastructure which is likely to be affected by coastal change.

Bullet point 3, helpfully outlines where relocated housing would be suitable, within DDBs or where no suitable site exists, outside but adjoining the DDBs or as a brownfield site, not of high environmental value. An appropriate site anywhere in the parish can be considered if replacing an important community asset or amenity. You might wish to define any areas which are considered appropriate for relocated development on the policies map.

This approach is considered to be in general conformity with adopted Policy ENV7 ii) which states “the replacement of properties affected by coastal change may be permitted within a defined area agreed through a community relocation strategy as an exception to normal policy.”

The Council is also supportive of the proposal to prepare a Village Improvement Project within paragraph 10.40 which seems to provide a similar role to a coastal adaption plan. A commitment towards the preparation of a coastal adaption plan within the Policy text would be encouraged and supported.

#### [Implementation and monitoring of the plan](#)

Dorset Council welcomes the Parish Council’s intention to annually monitor the Plan following the principals of plan, monitor and manage.