

## Charmouth Neighbourhood Plan: Consultation Summary April 2021

### Introduction

This Consultation Statement summarises all the statutory and non-statutory consultation that has been undertaken with the community and other relevant statutory bodies and stakeholders in developing Charmouth Neighbourhood Plan (CNP).

It describes how concerns have been addressed and what changes have been made to the CNP as a result of the Pre-submission Consultation (Regulation 14).

The purpose of this document is to demonstrate that CNP has been developed on the basis of wide and thorough community engagement. More specifically, the neighbourhood planning regulations (Regulation 14) require a consultation statement to be produced which:-

- (a) contains details of the persons and bodies who were consulted about the proposed Neighbourhood Plan;
- (b) explains the details of how they were consulted;
- (c) summarises the main issues and concerns raised through the consultation process; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### Summary of the Consultation prior to the Pre-submission Consultation

Section 1 of CNP and Appendix D contains the history of consultation which is summarised below:-

#### 2015 - 2016

A village consultation was initially held in the Village Hall on 21<sup>st</sup> June 2015 to gauge support and encourage involvement from local residents and people who work in the area. This was initially led by the Parish Council. A start-up meeting was held on the 7<sup>th</sup> December 2015, with interested parties, to form an independent Steering Group and appoint a chair and secretary.

The Steering Group held its first meeting on 18<sup>th</sup> January 2016 and has held regular meetings since. Minutes are available for viewing on the Parish website: <https://www.charmouthparishcouncil.gov.uk/neighbourhood-plan-minutes>

In March 2016, the Terms of Reference were agreed with the Parish Council which set out the remit for the Steering Group. As part of the Steering Group, six working parties were initially established to consider various aspects of the vision and main themes of this Plan.

In August 2016, street interviews were held during the morning and the afternoon near to the local shops, the Community Hall and the Library, to gain views on the draft vision and identify issues within the village that residents felt strongly about.

## 2017 - 2018

In February 2017 posters were placed around the village and a news item posted on the Parish Council website publicising the forthcoming Open Forum events in February and March. Also a 'facebook' account was opened to reach a wider and younger audience. The first Open Forum event was held on the 25<sup>th</sup> February 2017 to explain the purpose of CNP and its importance to the village. 50 people attended. The Forum was also used to inform residents of a forthcoming Village Survey, in which we were seeking their views on a number of issues, the results of which would be used in formulating this Plan.

In w/c 27<sup>th</sup> February 2017, a comprehensive Village Survey, comprised of 7 sections, was delivered to every household and business in the village (854 in total) seeking views on: the draft vision, natural environment, tourism, transport, community facilities, housing and employment in the parish; 38 questions in total. A pamphlet was also issued to every household publicising the forthcoming 'drop-in' session and draft vision.

On 11<sup>th</sup> March there was a 'Drop-in' Session arranged for general discussion on CNP and any queries arising from the Village Survey. 33 people attended. A news article was published in Shoreline magazine (Spring edition) publicising the survey and drop-in session. Note: Shoreline is a popular free village magazine capturing local events and news articles.

The survey closed on the 31<sup>st</sup> March 2017; there were 255 completed surveys representing 497 people who live or work in Charmouth. This represents a return rate of about 30% and was considered to be a



very good response. Initial feedback (i.e. numerical information) on the survey was given to the Parish Council on 29<sup>th</sup> August 2017 and then residents on 9<sup>th</sup> September 2017 at an Open Forum event. 48 people attended. Prior to the Open Forum, posters were placed around the village and put on the Parish Council website publicising the event.

Details of Open Forum Events and presentations can be seen on Charmouth Parish Council website:-

<https://www.charmouthparishcouncil.gov.uk/latest-news>

In October 2017, AECOM consultancy was commissioned to carry out a Housing Needs Assessment, the results of which were issued in March 2018. This was a demand-led study of the amount and type of housing Charmouth might need but it did not take into account some of the constraints to development. Information from this Report has been used as evidence in the formulation of the housing policies. The outcome of this Report and general issues were discussed with WDDC on the 14<sup>th</sup> February 2018.

## **2018**

There were 2690 comments from the Village Survey; it took 6 months to complete the qualitative analysis of these responses, which were set out in 29 detailed reports. See: <https://www.charmouthparishcouncil.gov.uk/qualitative-reports>. A Bulletin pamphlet was handed out, summarising the outcome of these reports, and a presentation given at the Open Forum on 10<sup>th</sup> March 2018, where 59 people attended. A news article on the results was also published in Shoreline magazine (Spring edition).

The information gained from the Village Survey has been invaluable in formulating the vision, objectives and policies of this Plan. Following the analysis of the Village Survey, the vision and objectives were finalised and then policies were developed from these to support the overall aims.

A Strategic Environmental Assessment was submitted by the Local Planning Authority to statutory consultees during September - October 2018. It was concluded that the Plan was unlikely to result in significant environmental impacts, largely due to the Plan not allocating land for additional housing and the environmental protection provided by existing policies in the West Dorset, Weymouth & Portland Local Plan.

In summer 2018, the Steering Group considered it would be useful to gain more information from local service providers including community groups about the needs of their businesses/groups so a Service Provider Questionnaire was issued and results compiled; a summary of the findings has been used to inform policies on business and employment.

Draft policies were compiled based upon the evidence gathered. Housing policies were first discussed with WDDC on the 13<sup>th</sup> November 2018.

## 2019

Draft policies, 19 in all, were produced and presented to the Parish Council on 11<sup>th</sup> December 2018 and then at an Open Forum on the 5<sup>th</sup> January 2019. 48 people attended and there was an opportunity to ask questions and comment on the draft policies as well as potential village improvement projects and local green spaces (LGS), which were all displayed on the wall for viewing. There were over 90 comments made, with the vast majority supporting the policies. Proposed LGS were also displayed in the Library for a further 6 weeks. Following this, feedback and comments on LGS were used to inform the LGS Report. See: <https://www.charmouthparishcouncil.gov.uk/Comments-on-draft-policies-and-projects-made-at-the-open-forum-on-5th-january-2019>



*Open Forum on 5<sup>th</sup> January 2019*

Draft Basic Conditions and draft copies of the main sections of CNP were issued to Dorset Council prior to the meeting on the 17<sup>th</sup> June 2019.

Following consultation with Dorset Council and the Parish Council, further updates were made to the policies and the Basic Conditions.

Habitats Regulation Assessment was carried out by Dorset Council on behalf of the Steering Group between December 2019 and January 2020. The result of the HRA screening concluded the 'Sidmouth to West Bay SAC' was the only site that could be affected by the proposed policies. The Report stated there were three likely significant effects that could arise so mitigation measures for these effects have been included in the policies.

A news article was published in Shoreline (Winter edition) providing an update on progress and likely timescale for producing the draft CNP.

A meeting was held with the Parish Council on 10<sup>th</sup> December 2019 to present all the draft policies (21 in total) and associated tables and maps for discussion. The Parish Council confirmed their support for these draft policies. Following this the draft policies were finalised and incorporated into the Pre-submission CNP.

## 2020

Following identification of landowners, obtained from the Parish Council and local estate agent, letters were sent in January/February 2020 to major land owners and owners of land who could be affected by site-specific policies inviting comments.

In the lead up to the Pre-submission Consultation there have been many email exchanges with WDDC and Dorset Council on developing specific policy themes and associated wording.

Pre-submission Consultation was planned for April but due to the COVID-19 outbreak this had to be postponed.

### Pre-submission Consultation

The revised Pre-submission Consultation period ran from Friday 31<sup>st</sup> July 2020 to Friday 11<sup>th</sup> September 2020 i.e. a 6 week period.

Due to the constraints of COVID-19 outbreak, hard copies of CNP could not be displayed in the Library or the Parish Council offices and therefore a particular effort was made to engage with residents Home delivery/pick-up of a paper copy of the CNP and feedback form was arranged for anyone unable to access the CNP online.

The process of making comments, either through the internet or on a paper response form, during the consultation period was publicised via:

- Main Village Noticeboard (with CNP Banner) and Posters around the village.
- Parish Council website – dedicated Neighbourhood Plan page:  
<https://www.charmouthparishcouncil.gov.uk/np-consultation>
- Pamphlets for customers distributed to local shops and library/Post Office providing information on consultation process and summarising the policies.



- News articles in LymeOnline and Bridport News, two articles in both before and during the consultation period.
- Regular reminders on the Charmouth Notice Board on facebook.
- Two articles in COVID-19 Newsletters distributed to all households in Charmouth included notification of the Pre-submission Consultation period. These newsletters were produced regularly by the Charmouth COVID Volunteers' Group.



### **Have your say on Charmouth's draft Neighbourhood Plan**

An electronic copy of CNP, supporting documents and response form were made available for viewing and commenting on from 0900 31<sup>st</sup> July 2020 to 1700 11<sup>th</sup> September 2020.

The response form was structured to obtain comments on specific policies and/or comments on particular sections/paragraphs.

Hard copies of CNP (including a response form) were delivered to 15 households for those who didn't have internet access or preferred reading a paper copy.

The previously planned consultation drop-in centres had to be abandoned due to COVID-19 but replaced by pre-arranged telephone sessions (5 in total). These were publicised in advance.

The following statutory consultees and other consultees were sent a letter via email prior to the start of the consultation.

<b>Local Council's Consultees</b>	<b>Responded</b>	<b>Other Consultees</b>	<b>Responded</b>	<b>Other Consultees</b>	<b>Responded</b>
Dorset Council(including planning policy)	Responded	Dorset Association of Parish and Town Councils		Car Park Owners	Responded
East Devon District Council		Dorset Wildlife Trust		Charmouth Traders	Responded
Lyme Regis Town Council		Dorset CPRE		The Village Hall	
Char Valley Parish Council		Charmouth Heritage Coast Centre	Responded	Charmouth Primary School	
Catherston Leweston Parish		Magna Housing Association Limited		Dorset Environmental Records Office (DERC)	
<b>Other Statutory Consultees</b>		St Andrew's Community Hall		Seadown holiday park	
Homes England		Dorset Racial Equality Council		Wood Farm holiday park	
Natural England	Responded	Churches Together in Dorset	Acknowledged	Manor Farm holiday park	
Environment Agency		Dorset Learning Disability Partnership Board		Little Catherston Farm	
Historic England	Responded	Jurassic Coast Trust	Responded	Greenloft House (Old Lily Farm Buildings)	
Highways England	Responded	Dorset Local Enterprise Partnership		Hogchester Farm	
Marine Management Organisation	Acknowledged	Dorset Local Nature Partnership		Dorset Planning Consultant Ltd	
Wessex Water	Acknowledged	Dorset AONB Partnership			

The following summarises the key points raised and suggested way forward. Respondents were given the opportunity to comment on each policy and/or generally on paragraphs. Consultees using the response form were encouraged to comment on those policies that they particularly support or oppose adding their reasons. They were also asked to tick one of three boxes: support the Plan; generally support the Plan with some changes as stated in comments; or do not support the Plan for reasons given in the comments.

Overall there were 45 responses with over 100 comments *this will increase once we include DC's comments*. 39 of these responses, which were from the community, completed the response form which included 8 hand written paper copies, the remaining (31) was submitted electronically. Of those who completed the response form 23 (59%) supported the Plan as drafted; 15 (38.5%) generally supported the Plan but suggested some changes and 1(2.5%) person did not support the Plan. One form showed the first two boxes ticked, which is included in the above figures and one form had no entry in the tick boxes. Other communication (6 in total) was received through email from statutory bodies and local businesses.

There were 297 unique pageviews of the CNP webpage of which 51 were via a Facebook advert.

All comments (i.e. statutory, businesses and community) are summarised in the section below, but are not replicated verbatim. Changes to the Plan, following consultation, are shown as ACTIONS in the Table below.

A further 6 weeks consultation (18<sup>th</sup> September to 30<sup>th</sup> October) was given to one landowner as a notification letter was inadvertently sent to another family member.

<b>Section/Policy</b>	<b>Main points raised</b>	<b>Respondents</b>	<b>Response and proposed change (if applicable)</b>
General Comments	18 comments of support were made in broadly 3 areas:-  Effort and Commitment – many complimentary views were expressed concerning the significant effort and time in compiling the Plan.	56027 56664 56746 57409 57563 57618 57626	Thank you for your comments and support.



	<p>Quality – many views expressed the Plan as being comprehensive, well written and researched.</p> <p>Consultation – some of the views recognised the significant amount of public consultation.</p>	<p>57640 57677 57708 57752 57758 57772 57784 57796 57834 57864 57994 58351</p>	
General Comments	Concern about the Plan being is too long and hard to read.	56623	<p>It is accepted the draft Plan is lengthy but a decision to incorporate as much evidence as practical within the document was taken at the onset avoiding the need to cross reference to other documents. There are other NPs that are similar in length e.g. Sturminster Newton, Shaftesbury, etc.</p> <p>The CNP was structured to give a logical flow from one CHAPTER to another, starting with the background and why it's important for Charmouth, setting out the vision and objectives and how these are related to each of the policies. Each of the main CHAPTERS followed a consistent layout, starting with Context, then references to relevant statutory regulations and other key documentation followed by evidence that we had gathered through consultation culminating in the policy itself. Each Chapter was structured with Sections and Subsections, and every paragraph is uniquely numbered.</p>

			<p>Each of the Chapters is colour coded so the reader can easily identify which policy it relates to.</p> <p>An Executive Summary was set out at the beginning of the Plan so a good understanding of each of the main chapters was provided with references to the specific policies. A Glossary was included as we were well aware many of the readers of the Plan may not be familiar with specific words or phrases used in planning 'speak'.</p>
General	<p>Concern raised over the quality of some of the maps in particular Maps 4.2, 4.3, 5.1 and 6.4</p> <p><i>Note comments summarised.</i></p>	Dorset Council	<p>Yes agreed. We will review legibility of maps and provide clearer and more detailed maps.</p> <p>ACTION: Maps improved and additional maps in Appendix E.</p>
General	<p>Design Policy? Given that the NP does not allocate any sites for development, which would normally have specific parameters built into site-specific policies, I think some comments on design parameters would be useful, drawing attention to the relevant sections of the Conservation Area Appraisal. This could cover, for example, what any new development should aspire to within the NP area in terms of form, scale, massing, materials, local distinctiveness etc. or indeed things to avoid (e.g. uPVC). This could either be included in the heritage policy or within a separate policy (possibly better) where the issues can be drawn out a little more.</p>	Dorset Council	<p>We consider that Policies H4 and H5 adequately describe housing form, layout and design requirements.</p> <p>Please also see Policy HH1 relating to the setting of new development.</p> <p>It was decided that it was not feasible to write a specific 'design document' due to Charmouth having such a variety of building ages and styles. The aim is to ensure that any new building or development must fit with its surroundings, setting, and neighbouring buildings. We believe H4 and H5 outline the parameters by which this can be achieved. To a great extent H4 and H5 follow what is said within CCSCAA.</p>
Vision p8/9	<p>Support given on the Vision statements recognising the valuable links to surveys and national, county and local policies.</p>	57563 57865	<p>Thank you for your support.</p>

Vision 2, para 2.1 p.8	Reference made to community 'feel' and not relevant to part of the natural environment.	57618	Community 'feel' is within the Objectives, which give more detail to Vision 2. The Vision and Objectives reflect the views expressed by residents/businesses during consultation in particular the Village Survey. Further comments relating to community feel are contained in the text.
Vision 4, para 2.1 p.9	Concern raised that vision or policy does not include restricting caravan sites. Also noted that caravan sites occupy substantial land areas and consideration should be given to replacing with permanent housing and how this would be dealt with in the Plan.	57618	There were no strong views from the Village Survey or in deed throughout the consultation (open forum events etc.) on restricting the expansion of caravan sites. In fact the majority of residents agree that Charmouth benefits from tourism so it didn't seem appropriate to include this as a main vision of the Plan or include a separate policy on restricting expansion.  No sites have been allocated for development. Any applications for housing on caravan sites would be judged against CNP policies and the Local Plan. CNP restricts development outside the DDB, where largely all the caravan sites are located. A small rural exception site could be considered if it adjoins the DDB boundary (Policies H1 & H2).
Vision 5, para 2.1 p.9	Comment made on the objective underpinning Vision 5 requires new footpaths and cycle routes from new housing development but the associated policy (GA1) needs to include new footpaths and cycle routes, regardless of any new development.  As no significant housing development sites are intended, new housing in itself is unlikely to justify anything other than very local paths.	57618	Policy GA1 allows for new footpaths and cycle routes regardless of new developments. Yes, the objective statement under Vision 5 needs to be made clearer. ACTION: change objective wording to reflect this intent. Yes however these new routes from development sites are to link up with existing routes where practical. This is covered in Policy GA1.

Communications para 3.11 page 19	Whilst the Digital Infrastructure Strategy and Super Broadband has brought benefits, upgrades to the equipment at the local telephone exchanges are still necessary, could pressure be applied to make this happen?	57640	Charmouth Parish Council have recently issued a notification asking residents to report on areas where broadband are poor and they will progress with the Local MP and BT. ACTION: Update para 3.11 to reflect current status.
Conservation Area 3.12	The latest Conservation Area Appraisal was published in 2009, not 2007	Dorset Council	Yes agreed. ACTION: Text updated
Map 4.2, p. 25 and Appendix F	The map showing listed buildings is limited to the Conservation Area only, even though the NP Area extends some considerable distance beyond and is coterminous with the parish. This means that LBs outside the Conservation Area are not shown on the map, but that the Toll House (Grade II; 1118901) to the E of Charmouth Bridge is omitted from the list on Appendix F	Dorset Council	Please note The Toll House is listed in Appendix F. A Map Appendix has been added containing additional maps of the whole parish including the other 3 LBs.
4.8 and 4.9, pp. 26-27	The text here could be clearer in stating that a) the 'important local buildings' identified in the CA Appraisal are to be treated as non-designated heritage assets; and that b) that the list offered in 4.9 is <i>in addition to</i> that list. As far as I can see, none of those listed in Table 4.1 is duplicated from the CA Appraisal. The point should also be made that the list is not exhaustive and that other non-designated heritage assets might be identified in future through the planning process or through further research which highlights previously unknown elements of significance. The entry H4 for Old Cement Works building should	Dorset Council	The burgrave walls and important local buildings have not been included in the list as they are within the Conservation Area which offers adequate protection. Asset H1 being the boundary to the mediaeval village was considered to be of special historical interest, hence its inclusion.  The fact that the NDHA list is not fixed is noted and text added to clarify this point.  ACTION: Text updated.  Mention of the Kiln has been moved from H5 to H4 in Table 4.1.

	specifically include the kiln to the rear.		ACTION: Table amended.
4.8 and 4.9, pp. 26-27	<p>Given our comments above regarding looking at heritage assets over the whole NP area, I'd suggest that the list is revisited to ensure that any other non-designated heritage assets outside the CA are included where necessary (e.g. post-medieval quarry to the S of the A35; MDO29552). See also comment on Policy BET3 below.</p> <p>Some possible further non-designated heritage assets within the NP area suggested themselves from our visit:</p> <ul style="list-style-type: none"> <li>• the two arms of the former turnpike road to Lyme Regis (Old Lyme Hill – identified as 'monuments' on the Dorset HER (MWX78); and</li> <li>• 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.</li> </ul>	Dorset Council	<p>Thank you for your comments and paragraph 4.9 has been expanded accordingly.</p> <p>ACTION: Text updated.</p> <p>See above response regarding the burgage walls.</p>
4.11 page 28	Concern was raised about making generalisations without giving examples and final sentence needs	56623	<p>Yes agreed.</p> <p>ACTION: Paragraph 4.11 to be amended.</p>

	clarifying.		
Policy HH1: Heritage Assets	Comments were made about the Old Cement Works being listed in table 4.1 as well as table 5.1. So as policy HRA1 makes reference to AA1, in terms of any development not adversely affecting the integrity of Sidmouth to West Bay SAC, policy HRA1 should also make reference to HH1 as they both cover the Old Cement Works.	Ref: 323563 Natural England	To differentiate between the building and its occupants clarification has been added. The Old Cement Works Building is a Heritage Asset referred to by policy HH1 as the asset in this case is the building. The Community Asset of the Heritage Coast Centre mentioned in Policy AA1 is the organisation which occupies the upper floor of the Old Cement Works Building.  ACTION: Slight amendment to policy HRA1.  Policy HRA1 bp1 now says: <ul style="list-style-type: none"> <li>developments associated with community assets as described in policy AA1 or buildings sited by the coast</li> </ul> Clarification text also added above Table 5.1
4.14, p. 29	This paragraph doesn't quite make sense as it stands. Does it relate just too non-designated assets? I'd suggest the following re-wording, which builds out the NPPF wording: 'Any proposal which could adversely affect a non-designated heritage asset or its setting will require justification proportionate to extent of the harm to its significance, bearing in mind that...'	Dorset Council	Thank you for your comments and text has been updated to reflect your suggestion. ACTION: Text updated.
Policy HH1	The second bullet point largely repeats provisions in the NPPF and Local Plan and could perhaps be tweaked to strengthen these overarching provisions. 'Applications for development directly or	Dorset Council	

	<p>indirectly affecting heritage assets must be accompanied by an assessment of significance, including any contribution made by their settings. The assessment should be sufficiently detailed to demonstrate that the significance of all affected heritage assets has been fully understood and for impacts to be properly assessed.'</p> <p>The first and last bullet points effectively make the same point. I'd suggest sticking with the last bullet point and placing after the one above: 'Any development proposal which would directly or indirectly result in harm to the significance of locally important heritage assets, including any contribution made by their setting, will be resisted.'</p> <p>Phrasing along these lines is sufficient to cover both damage and demolition, as well as anything else that results in harm.</p> <p>Dorset Council is concerned that bullet point two duplicates the Council's existing 'Planning Application Requirements April 2019' checklist which similarly requires a heritage statement "for applications which affect or may affect an historic asset." It is however noted the list of examples is expanded to include non-designated heritage assets.</p> <p>We welcome table 4.1 which lists seven locally identified 'Important non-designated Heritage Assets' including an asset description.</p>		<p>Thank you for your comments. Text has been duly amended.</p> <p>ACTION: Policy name has been changed ACTION: Policy bullet points and wording changed</p>
Policy HH1 page 29	Concern was raised over the defined term 'will' and 'should' questioning the intent in using the word	56623	'Will' and 'Should' have specifically been defined as they are regularly used in policies to convey the intent

	'would'.		required, so clarity of their meaning is important. 'Would' is used in the context of a hypothesis not an obligation, no uneven-handedness intended.
Para 5.7 pages 30 to 34 including Table 5.1	<p>It was suggested that Table 5.1 contained a random list of assets and amenities in both public and private ownership.</p> <p>It was also suggested that other community assets are included such as the Tennis Club.</p> <p>Other comments raised were:</p> <ul style="list-style-type: none"> <li>- Public houses mentioned but not food suppliers.</li> <li>- Fire Station is manned by Trained and Paid Retained Firemen, not strictly volunteers.</li> <li>- The Elms is an Administrative building, which is not listed, does it warrant being included as an asset.</li> </ul>	57640 56623	<p>The list of assets and amenities in Table 5.1 was compiled following feedback from the Village Survey.</p> <p>Whilst the Tennis Club is a community asset, it is a private club and unlike the listed community assets which are 'open and available' to the public for use.</p> <p>Public houses are traditionally well-established meeting places for locals. The Royal Oak has been an Inn since 1867, although the building itself is far older than that. The George Inn was built as an inn in the sixteenth century, replacing a much older building on that site which had offered hospitality to travellers.</p> <p>ACTION: Text updated in Table 5.1 A13.</p> <p>Food suppliers and other shops are recognised as important assets and included in Policy BET1 which gives them a form of protection.</p> <p>ACTION: The wording of A14 re the Fire Station has been amended.</p> <p>In Table 5.1, at A8, for the reasons stated The Elms was considered as asset to the village as a valuable place for business, etc. There are limited places for businesses within Charmouth.</p>



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. However, it is concerned that bullet point 1 is too restrictive when considering the geographic scope of alternative provision given the small size of the Charmouth Neighbourhood Plan Area. In some instances it would not seem unreasonable to locate certain community assets and amenities beyond the Neighbourhood Plan boundary. For example the allotments A15 are already partly outside the Neighbourhood Area. Although any development outside the Plan area would not be subject to the policies in the Neighbourhood Plan in any event.	Dorset Council	Thank you for your comments.  Policy AA1 has been changed to include: 'If no alternative within the Neighbourhood Plan area is available, relocation outside the NP area could be considered provided the new location is appropriate to its function and continues to serve the local community.' ACTION: Policy AA1 updated.
AA1 Protecting Assets and amenities p 35	Comment made about consideration for alternative provision/location of the amenities provided by the Old Cement Works Building?	57848 57677	The Pathfinder Project gave consideration to 5 alternative locations which were proposed to and voted upon by the village; but it later transpired that none were deemed suitable. We believe this should be explored further as a separate project but it is outside the scope of the NP. See Village Improvement Project 2. SEE 10.33 See CPC's Report on DEFRA Coastal Pathfinder Programme (in Appendix E). See also paragraph 10.34 on relocation of coastal premises and policy CC2 where support for the relocation of coastal premises has been included should this be necessary.
AA1 page 35	Reference was made to the demographic age distribution, 52% over 60 and principally retired,	57367	Yes agree. Volunteering groups etc. are a significant asset and shape the character of the village. This is

	having more time/resources and the value of volunteering, interest groups, convenient local shopping and employment of local tradesmen, shaping the character of the village.		conveyed in Vision No.5 and its objectives. Where possible (in planning terms) CNP aims to protect our assets, amenities and businesses to maintain the village character whilst encouraging new businesses and housing development.
AA1 page 35	Comment was made on the biggest asset risk being the loss of A17 (Footbridge) and A1 (Heritage Centre) both impacting on people's enjoyment and commercial tourist trade. Mitigation Plans need to be in place including resurrection of Heritage Centre re-siting Policy CC2 and comments 10.24 and 10.33.	57367	These assets are very valuable hence their inclusion in Policy AA1. Regarding mitigation plans, these need to be considered by the Parish Council and could possibly form a separate project but this is outside the scope of the CNP. The issue of resurrection of the Heritage Coast Centre in the event of its loss should be explored further as a separate project but it is outside the scope of the CNP. See Village Improvement Project 2. ACTION: Project 2 (Coast) updated.
AA1 page 35	Comment was made on the good intention of the policy to support commercial businesses, but stating National/County wide policies will lessen the impact such as provision of Health services, location of fire stations and utilisation of Public houses. The lack of volunteer support would be more crucial than need or financial viability for locally run assets.	56623	The aim of the policy is to highlight those assets that the villagers, through consultation, recognised as being important to the community.  Particular assets and amenities rely on being commercially successful but the broad intent throughout the Plan and as captured in the Vision statements is to support all businesses and amenities wherever that is possible within future planning legislation.  The policy does not specify that 'viability' has to be financial, and as you say viability could include the role or availability of volunteers.

			<p>CNP recognises the value and importance of a sustainable community from which volunteers will be able to support amenities, assets and activities. See particularly 8.22 and Policy H3.</p> <p>The broad intent throughout the Plan, as captured in the Vision statements, is to support all businesses and amenities wherever possible. Policies are included which will help to ensure a sustainable permanent community which will provide generate volunteers.</p>
Section 6	Suggestion was made to plant flowers in the roundabout off the A35 on the entrance into Charmouth.	Paper 2	Thank you for your suggestion. This area comes under the remit of Highways England which has recently cleared vegetation on the roundabout and is planning to plant wild flowers. Providing a welcome at either end of the village through planting was identified during the Village Survey (VS Report 4).
Page 37, para 6.8	Suggestion was made to expand this paragraph to clarify the position of WHSs within the planning system and their status as a conservation designation.	57842	<p>Yes agreed.</p> <p>ACTION: Paragraph 6.8 updated and approved by JCT.</p>
Policy HRA1: Habitats Regulations	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 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	Dorset Council	<p>Thank you for your support.</p> <p>Paragraph 6.17 has been rewritten to clarify the HRA Report: The HRA Report stated that: “However, a likely significant effect [<i>i.e. through development within Charmouth Parish</i>] upon a European Site from the following three pathways could not be confidently ruled out” then followed by the bullet points. ACTION: Text amended.</p>

Policy HRA1: Habitats Regulations	Support given for the inclusion of a specific policy for the Habitats Regulations and with the conclusions of the accompanying HRA prepared by Dorset Council in December 2019 with the recommendations going into the NP.	Natural England	Thank you for your feedback and support.
Policy HRA1 p40	Support given regarding information about Charmouth in the context of the coastline from Sidmouth to West Bay.	57784	Thank you for your feedback and support.
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.	Dorset Council	Thank you for your feedback and support.
Policy NE1: Landscape and NE2: Views and Vistas	Support given to these policies as they recognise the importance of the area's contribution to the landscape of the AONB.	Natural England	Thank you for your feedback and support.
Policies NE 1 – 7 pp42 – 63	Support given for the policies in particular, NE3, NE4 and NE7.	57784	Thank you for your positive comments
NE1 Page 42	Support given for wildlife corridors/habitats to be protected. Comment made concerning grassland above Black Venn not being mowed by the CPC.	57758	Thank you for your comments. Please note the area of grassland above Black Ven is a proposed Local Green Space and covered in Policy NE4. Management of the area is covered by the CPC Foreshore Management Plan.
Policy NE1 page 42 and Policy NE2 page 49	Concern raised about the wording 'Development will not be permitted which would interrupt panoramic views' (NE1) and 'Development will be supported where it conserves and enhances local landscape' (NE2). It would be difficult to agree new or modified builds which could not be contested on this basis.	57367	Whilst understanding why you may have come to this conclusion it is believed that development is possible even with these caveats. The intent of Policy NE1 is to protect the wider landscape and any prominent features hence the inclusion of Table 6.1 and Map 6.2. The intent of Policy NE2 is to protect more local public views and vistas hence the inclusion of Table 6.2 and

			Map 6.2.  ACTION: The word <u>uninterrupted</u> has been removed from Policy NE1.
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 8 'locally important views' and their description / reason.  Dorset Council is concerned that bullet point four duplicates the Councils existing 'Planning Application Requirements April 2019' checklist which similarly requires a Landscape and Visual Impact Assessment (LVIA) for "any scale of development that is likely to have a significant impact on the surrounding landscape and/or townscape character. Where development would be prominent in the wider landscape, a visual envelope study and photomontages shall be included in the application, and reference should also be made to the impact of the development on the local character."	Dorset Council	Thank you for your comments and support.  Regarding bullet point four, this has now been deleted and paragraph 6.36 has been amended to state: 'is required under 'Planning Application Requirements April 2019' ACTION: NE2 Policy and text amended.
Policy NE2 p49	Support given for this policy. Suggestion given to include a view eastwards towards the coast from the turning 'circle' at the top of Higher Sea Lane.	57864	Thank you for your suggestion which has now been included in Table 6.2 and Map 6.2. ACTION: Table 6.2 amended and photograph included.
Policy NE2 Page 49	Support given in particular wildlife assistance measures and wildlife corridors and biodiversity.	Paper 4	Thank you for your comments and support.
Section 6 page 52 & Page 62	Comment made concerning the small size of maps (map 6.4 and map 6.7) and difficulty reading legends and locations.	Paper 4	Yes agreed better clarity of maps included and additional maps provided in Appendix.

	Concern raised about 3 yew trees in the churchyard and a tall pine in Lower Sea lane (near Hensleigh House) on whether they have TPO's.		ACTION: Better quality maps included and additional TPO Maps included in Appendix.  ACTION: Query (re. TPOs) passed onto to Tree Warden at CPC.
Habitats, Wildlife Corridors and Biodiversity, paragraph 6.48	The comments within the Plan with regards to the A35 verges are noted. Whilst every effort is made to support, encourage and enhance biodiversity, this necessarily needs to be balanced against the requirement for us to also manage our soft estate in the interest of maintaining a safe and efficient network. The maintenance regime required for any highway verge plots that may be proposed for SNCI designation must be discussed with Highways England prior to progressing such designation.	Highways England	Yes it is accepted that Highways England manages and maintains the soft verges. ACTION: the wording of 6.48 has been amended to include...Highways England has a duty to manage and maintain its verges and has stated "... Regarding the proposal for SNCI designation, and the impact upon your maintenance regime, this has originated from Dorset Wildlife Trust and has not come from the CNP. Please see document on 'Botanical Survey of Verges along A35 Charmouth Bypass' referred to Appendix E , found on the following link: <a href="https://www.charmouthparishcouncil.gov.uk/file/cnp-a35-report-appendix.docx">https://www.charmouthparishcouncil.gov.uk/file/cnp-a35-report-appendix.docx</a> This document can also be found on Charmouth Parish Council's website under Neighbourhood Plan/Pre-submission Consultation. ACTION: Response sent to Highways England
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. We are concerned that bullet point 1 is too restrictive and goes beyond the scope of National Planning Policy. To highlight several key paragraphs: <ul style="list-style-type: none"> <li>• Paragraph 170 d) states that planning</li> </ul>	Dorset Council	Your concern regarding bullet point 1 is duly noted and has been deleted from the policy.

	<p>policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.</p> <ul style="list-style-type: none"> <li>• Paragraph 171 advises that plans should distinguish between the hierarchies of international, nationally and locally designated sites.</li> <li>• Paragraph 175 continues that when determining planning applications local planning authorities should apply the following principles if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequate mitigation, or as a last resort, compensated for then planning permission should be refused.</li> </ul> <p>In applying these principles to bullet point 1, the policy as currently worded would restrict all development that would damage (harm) all flora and fauna within the environment where as National Policy requires alternative sites with less harmful impacts, adequate mitigation or compensation before permission is refused. Bullet</p>		
--	---	--	--

	<p>point 1 also makes no allowance for the hierarchy of international, nationally and locally designated sites treating all flora and fauna equally.</p> <p>We are also unsure if bullet point 2 reflects supporting paragraph 6.59 that appears to go further in seeking to retain trees, hedgerows, local wildlife areas and other features that contribute to the area’s landscape and biodiversity interest. ‘Biodiversity’ being missing from bullet point 2? The same paragraph also adds the caveat “Only where retention of biodiversity features is not feasible should provision be made for suitable replacement.” which is not in policy text.</p> <p>It would be helpful if the supporting text could provide the decision maker with an approach to the identification of those trees, hedgerows and woodlands which make a significant contribution to the character of the local landscape.</p> <p>Bullet point 3 seeks to resist development that interrupts the integrity and continuity of green infrastructure. We would encourage the NP to provide further flexibility such as “unless clearly outweighed by other considerations”.</p> <p>Bullet point 4 seeks to outline the NPPF paragraph 175 principal of avoid, mitigate and as a last resort</p>		<p>The word biodiversity has been added to bullet point 2.</p> <p>Your point about ‘retention of biodiversity features’ is now included in policy.</p> <p>Paragraph 6.58 has been amended to cross reference to Table 6.1, Map 6.3 and 6.4 as follows:-  ‘Development must retain and incorporate the natural assets such as trees, hedgerows, woodland, local wildlife areas and other features, all of which make a significant contribution to the biodiversity and character of the local landscape and enjoyment of it. See Table 6.1, Map 6.3 and Map 6.4.</p> <p>Bullet point 3 has been amended as follows:-  ‘Development which interrupts the integrity and continuity of green infrastructure, green corridors and ecological networks is contrary to biodiversity aims and will be resisted, unless clearly outweighed by other benefits.’</p> <p>Paras 6.58 to 6.60 have been rewritten to further explain the issue of cumulative effect on wildlife and</p>
--	---	--	--



	<p>compensate. We are concerned that paragraph 6.60 of the NP dismisses compensatory measures where harm cannot be avoided or mitigated on the basis of the limited or non-existent options for suitable locations and would therefore be unviable. This approach seems unreasonable given the size of the parish and opportunities in adjacent parishes.</p> <p>Bullet point 5 refers to ‘Development plans’ which is very similar to the phrase ‘development plan’ which has a specific planning meaning, so to avoid confusion an alternative phrase is suggested, for example, development proposal.</p> <p>Bullet point 6, seeks an initial scoping/feasibility appraisal that identifies ecological aspects or considerations, where the proposed development site includes or adjoins: a large mature garden; mature trees; woodland; field or roadside hedgerows; river floodplain; meadow; species-rich grassland.</p> <p>In contrast, Dorset Council’s existing ‘Planning Application Requirements’ (April 2019), which in turn is based on the ‘Dorset Biodiversity Appraisal Protocol’, seeks a Biodiversity Appraisal accompanied by a standardised Biodiversity Mitigation Plan (BMP) only relating to the following:</p> <ul style="list-style-type: none"> <li>• all development sites 0.1ha or greater in size</li> <li>• sites where there are known protected</li> </ul>		<p>habitats of a few small developments, resulting in disproportionate impact.</p> <p>Regarding bullet point 5, text has been amended in line with your suggestion.</p> <p>Regarding bullet point 6, your comments are duly noted and text has been amended to lessen the requirement but keep the bullet point, which now reads:  ‘On sites below the standard threshold for a biodiversity appraisal (i.e. for new development of a site less than 0.1ha) applicants must identify, within their application, the possible ecological impact of their development where the proposed development site includes or adjoins: a large mature garden; mature trees; woodland; field or roadside hedgerows; river floodplain; meadow; species-rich grassland.’</p> <p>The reason for retaining this is because most developments are likely to be of small scale but the</p>
--	---	--	---

	<p>species or important habitats / habitat features</p> <ul style="list-style-type: none"> <li>• all greenfield or brownfield development sites above 0.1ha in size not currently used as existing residential or business premises.</li> <li>• A BMP is also sought for any sized rural barn.</li> </ul> <p>Although the supporting text to the Neighbourhood Plan policy provides a justification for these additional measures arguing in paragraph 6.58 “few development sites will be as large as 0.1ha in Charmouth, this Plan requires that applicants must submit (as a minimum) an initial scoping/feasibility appraisal that identifies ecological aspects. This is not intended to slow down development, but early knowledge of potential nature conservation issues can ensure that development proposals include suitable avoidance or mitigation measures, rather than necessitating the revision of plans later because a protected species is first noticed when construction is about to start.”</p> <p>The Council is concerned that this policy requirement overly complicates an already established process. The harm judged by applications below 0.1ha is considered to be minimal and not significant enough to seek, as standard an initial scoping/feasibility appraisal. It is suggested this policy requirement should be</p>		<p>cumulative effect of several small developments is likely to have a disproportionate impact within the relatively small area of the parish.</p>
--	--	--	--

	removed or only applies to development sites above 0.1ha or greater in size.		ACTION: NE3 Policy amended.
Policy NE3: Biodiversity and Natural Habitats	We welcome inclusion of this policy which seeks to conserve and enhance the flora and fauna of the plan area.	Natural England	Thank you for your comment and support.
Policy NE3	Support given to this policy.	57758	Thank you for your comment and support.
Table 6.5 LGS7	<p>An objection was received for the nomination of LGS7.</p> <p>The objection centred around the following main issues:-</p> <ul style="list-style-type: none"> <li>- The area already being protected under AONB and the need of additional benefit being gained by the designation of this LGS</li> <li>- Providing solid reasons and justification for adding this designation</li> <li>- Demonstrating this designation is special to the community</li> </ul>	61820	<p>Neighbourhood Plans provide the community with the opportunity to add local detail, in particular site specific references, to existing national statutory plans.</p> <p>The detailed Local Green Spaces Report referred to Paragraph 6.66 along with the Green Audit demonstrates the processes that have been followed to nominate this particular LGS. It is considered these measures satisfy the requirement of the Regulations. The AONB Plan does not specify any Local Green Spaces. Whilst all of the proposed sites are within AONB the criteria to satisfy this particular space as a LGS is still permissible and eligible for designation. The reasons and justification has been set against the criteria set in the regulations.</p> <p>The Village Survey identified that there is considerable interest in conservation and wildlife. This is reinforced by the recent instigation of a village group of those concerned about the environment/ biodiversity/ climate change issues.</p> <p>Details of species observed on LGS7 is available.</p>

			<p>It is considered that LGS7 meets the neighbourhood plan criteria and guidance on designating a Local Green Space.</p> <p><b>ACTION:</b> Independent Planning Consultant was asked to review compliance. The conclusion was as follows: ‘The supporting evidence demonstrates that the Parish Council and Neighbourhood Plan working group have had due regard to the NPPF tests in determining the green spaces included in the plan, and the evidence appears reasonable and proportionate.’ Letter to be sent to consultee.</p> <p><b>ACTION:</b> LGS Report has been updated</p>
Table 6.5, page 56	Comment made that whilst some of the proposed green spaces are small there cumulative effect enhances the appearance of the village.	57708	<p>Thank you for your comment. <b>ACTION:</b> The wording of 6.69 has been updated.</p>
Table 6.5 page 57	Reference was made to two green spaces, mentioned elsewhere as possibly being under-utilised, whilst recognising such areas will always be important for leisure and recreational use, should these be given special protection? The river and the fields above LGS 10 do not get a mention.	56623	<p>The detailed Local Green Spaces Report referred to in Paragraph 6.66 and the Green Audit demonstrates the process followed to nominate these particular LGSs. Both these sites satisfy the neighbourhood plan criteria and guidance on designating a Local Green Space. The river and fields you mention were not nominated by residents as potential green spaces. <b>ACTION:</b> Text of LGS9 in Table 6.5 now includes reference to river bank. The fields do not fit the LGS criteria so are not included. Similarly it is not possible to nominate a</p>

			river as an LGS.
Para 6.67 page 56	A suggestion was made that the Tennis Club should be an important Green Space.  Support given for the inclusion of Tommy's Patch – LGS12.	57640	There are specific criteria for the nomination of Local Green Spaces and the Tennis Club does not meet hast criteria.  Thank you for your support for LGS12.
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.	Dorset Council	Thank you for your comments and support.
Policy NE4: Local Green Spaces and GA1: Pedestrian Routes	We welcome this policy which seeks to safeguard the local green spaces and pedestrian routes for the community. We note that there don't appear to be any bridleways in the parish at present so we are pleased that any new routes are suggested to cater for both foot traffic and cycling.	Natural England	Thank you for your feedback and support.
Policy NE4 Page 59	Support given to include the recreation ground (LGS10) recognising it's been very important during lockdown.	Paper 1	Thank you for your feedback and support.
Policy NE4 Page 59	Comments received about there being more potential for Local Green Spaces than those identified. Examples given: the path from Double Common beside the school and the area surrounding the school playing field. Suggestion made to designate more Local Green Spaces in future could be made clearer.	57618	The detailed Local Green Spaces Report as referred to in Paragraph 6.66 along with the Green Audit shows the process followed to nominate LGSs. There are criteria to be met in order to nominate a site. Regarding your specific suggestions the path from Double Common is included in GA1 (Pedestrian Routes) and considered safe-guarded as a footpath. The area surrounding the school playing field was

			<p>considered (see LGS Report) but did not meet the criteria.</p> <p>ACTION: 6.71 now states that if identified, it would be possible to add further Local Green Spaces during any review of the 'made' CNP.</p>
<p>Proposed Local Green Spaces – Policy NE4, table and map 6.5</p>	<p>An objection was received from Highways England on the inclusion of site LGS1 as a proposed designated local green space as follows:-</p> <p>Whilst we have no current plans to alter the setting and management of this area, it nonetheless forms part of the operational highway and has highway rights upon it (as provided by the Highways Act 1980 and associated legislation). Highway land is also subject to permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2015, and may need to be utilised in bringing forward future highway/transport schemes, which may not be compatible with Local Green Space designation.</p> <p>It is not therefore suitable for designation which would conflict with our ability to manage our asset in the interest of all road users and fulfil our statutory function as strategic highway authority. We also do not consider that it fulfils the requirements within the NPPF as neither capable of enduring beyond the plan period for the reasons above, nor satisfying the criteria within paragraph 100. It is disappointing that our previous comments</p>	<p>Highways England</p>	<p>Thank you for your comment. Following review by the CNP Steering Group we agree that site LGS1 will be removed as a proposed site.</p> <p>Please note your previous comments were not received as there was an error in the email address you previously used.</p> <p>ACTION: LGS Report updated. Letter has been sent to Highways England ACTION: Table 6.5 has been amended to note LGS1 has been removed.</p>

	in this regard, dated 29 January 2020, have not been acknowledged in this version of the plan.		
Policy NE5: Lighting	Dorset Council supports the aims of Policy NE5 and the balance it seeks to make between, too much light leading to light pollution and too little causing safety concerns.	Dorset Council	Thank you for your comments and support.
NE5 p60	Comment made regarding whether this policy only applies to street lighting and if it does suggests a title change or is it just street lighting that needs to be 'down-lighting'?	57864	Thank you. The policy applies to lighting including street lighting: the Policy title has been changed.  ACTION: policy NE5 title changed to "Street Lighting, and Light Pollution"
Policy NE5 Lighting page 60 Street Lighting 6.72-6.76	Comments received supporting the policy but raising concerns about the level of street lighting being inadequate in certain areas e.g. The Street. Safety concerns were highlighted.	Paper 1 57409 57796	Lighting is an issue with many residents and your comments will be passed onto CPC ACTION: Comments sent to CPC.
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 Councils 'Planning Application Requirements' (April 2019).	Dorset Council	Thank you for your comments and support.  Please note supporting text has been amended. ACTION: Text amended.
Pollution – Policy NE6	Highways England support the requirement for new housing development to satisfactorily assess and mitigate any impacts arising from A35 traffic noise, but draw your attention to the requirements of DfT	Highways England	Thank you for your comments. ACTION: 6.78 text amended to include note about the Circular, but policy is unchanged.

	<p>Circular 02/2013, Annex A, paragraph A1, which states that for reasons of safety, liability and maintenance, noise fences, screening and other structures must be erected within the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land.</p> <p>Highways England also emphasised that for any development site that may be in proximity to the A35, the Highways England soft estate should not be relied upon to contribute any mitigation as the management of our estate may from time to time affect any real or perceived benefits.</p>		
Policy NE6: Pollution	Natural England supports this policy which seeks to minimise pollution as a result of development in the plan area.	Natural England	Thank you for your comments and support.
Policy NE7: Land Instability and Geology	Policy NE7 is supported.	Dorset Council	Thank you for your support.
Section 7	Concern raised over the loss of the Post Office and the future of Old Devon Edge and adjacent property as it's been empty for a long time.	Paper 1	<p>This emphasises the Plan's intent of trying to retain our existing shops and amenities. See Policy BET1 and AA1.</p> <p>Post Office services are still available in the village. Regarding Devon Edge, we are not involved and have no knowledge of the ongoing sale of that property, although CNP does want to retain commercial properties such as this if at all possible.</p>
Tourism 7.8-711	General compliments about the Plan but raised a concern that an increase in tourism could outstretch	57798	You may be referring to the reference in 7.9 that says: '69% feel we should encourage tourists to visit more



	<p>the capacity of the village like other seaside locations.</p> <p>Concern was raised about the health risk from congestion and suggested curtailing public investment in tourism and investing in traffic management and public facilities in the village.</p>	<p>than just the beach and spend more money locally.’ This reference comes from the Village Survey and is reflecting the views of residents concerning tourism. This refers to tourists going elsewhere than the beach, rather than suggesting more tourists come to the village.</p> <p>Also in the Service Provider Survey many of the Service Providers, particularly retail outlets, rely heavily upon tourism to make their business viable. It is widely recognised that Charmouth does benefit from tourism, in particular local businesses. It is recognised there is a down side to the village (e.g. congestion and pollution) particularly during summer months. See 9.23 and 9.24, and VS Report 8. One of the Projects identified in Appendix G proposes looking at speed restrictions and parking by undertaking further research to identify ways of tackling these problems.</p> <p>It is important to protect existing car parks and parking generally hence the inclusion of Policy GA2. The purpose of CNP is not to influence public spending on any particular sector but to reflect local planning aspirations.</p> <p>You will see from the Vision statements in Table 2.1 the intent is to protect the village’s unique qualities but also to support retail units and local businesses by continuing to attract tourists and visitors. The Policies that have been proposed try to reflect this balance of protection of the village and supporting/encouraging local businesses.</p>
--	--	--

<p>Tourism Section 7 page 65</p>	<p>Expressed thanks and support for the Plan saying it was well written and a thoughtful document. Concern was raised concerning the impact of Coronavirus has had on Tourism and how facilities could adapt in land use and operational terms, in particular camping/caravan sites.</p>	<p>56664</p>	<p>Thank you for your support. Clearly the impact of coronavirus has affected local businesses and tourism. However it is difficult to gauge whether this will be a long term problem. On a positive note in the period when restrictions were lifted by the Government there has been a return in tourism in the village. Your point about operational issues concerning camping/caravan sites is understood but we fail to see how this could be addressed in developing local planning policies, which is the purpose of CNP. These issues will be a matter for local businesses.</p>
<p>Tourism Para 7.11, p.66</p>	<p>Surprised there was no policy on tourism given its significance to the area, noting that little reference was made to agriculture and forestry as management thereof contributes to such an attractive setting.</p>	<p>57618</p>	<p>The importance of tourism is recognised but when we considered the feedback received from residents and businesses and the existing policies contained in the Local Plan, in particular LP-ECON5 and LP-ECON7, along with the proposed policies in the CNP it was considered this to be adequate in meeting our overall vision and objectives. Your comments on good management of surrounding land and woodlands and the impact it has on the wider setting are understood but these are operational matters not relating to planning legislation/policies. However we have included in Section 6 many aspects of the surrounding environment and its setting.</p>
<p>Policy BET1</p>	<p>Dorset Council is supportive of the Plan's aim to support the protection of existing retail properties. The Council would bring to the attention the recent changes to the use class order which come into</p>	<p>Dorset Council</p>	<p>Thank you for your support. Yes we are aware of these changes that have come about since we issued the draft Plan. We would prefer to change wording of BET1 to reflect the new</p>

	<p>effect on 1 September 2020.  Note: details provided by the Council.  To retain the aim of the policy, the policy text would need to be updated to either reference the new use class order (Class E, F.2 and specifically mention public houses) or perhaps more simply reference the identified units which are mapped.</p>		<p>definition of class order. Thank you for bringing this to our attention.  ACTION: Policy updated with new class order.</p>
Policy BET1	<p>It would be helpful for the decision maker for the supporting text to clarify the length in time required to demonstrate “extensive marketing”.</p>	Dorset Council	<p>‘Extensive marketing’ was not meant to mean necessarily a lengthy time period but demonstrate that various and comprehensive marketing methods had been made to keep the property as a retail/commercial outlet.  ACTION: Clarity provided in the supporting text.</p>
Policy BET1 Charmouth Retail Hub Page 69	<p>Support given to this policy but concern that trying to retain commercial outlets it could mean empty shop fronts standing for several years which does not look good and, if suitable, conversion to a dwelling would be better.</p>	57409	<p>The purpose of BET1 policy (1<sup>st</sup> bullet point) is to try and retain commercial outlets as there are deemed so important and valuable by residents.  However, if it is proven that such a property can no longer be viable then conversion of a property use is possible. It does not necessarily mean a lengthy time period as long as the owner can demonstrate that various and comprehensive marketing methods had been made to keep the property as a retail/commercial outlet.  ACTION: Clarity given in paragraph 7.18 on what extensive marketing means.</p>
Policy BET1 Page 69	<p>Comments saying there were other reasons beyond financial considerations which affect the running of business and this policy could be financially damaging. It was also stated elsewhere in CNP that a reduction in Holiday homes/holiday lets would be</p>	56623	<p>Yes we understand that there may be other reasons why someone would want to sell their business. BET1 policy doesn’t say financial viability but that a commercial use is no longer viable. If the property cannot be retained as a commercial property then the</p>

	<p>the solution to local businesses. If Charmouth used these valued businesses more they would be more profitable.</p>		<p>option of a 'change of use' is available. We do not see this is as necessarily financially damaging.</p> <p>CNP is not saying a reduction in Holiday homes/holiday lets would be the solution neither is that the intent. However Charmouth's Traders have confirmed their desire for more permanent residents to balance the current seasonal trading imbalance resulting from the number of second homes and holiday lets. For future new housing we have proposed a principal residence condition in Policy H3 so that occupant(s) will be resident the majority of the time.</p>
<p>Policy BET2 Page 73</p>	<p>For the same reasons set out above in our comments to Policy BET1 this policy will require updating to reflect the latest changes to the use class order or simply avoid any reference.</p>	<p>Dorset Council</p>	<p>Yes agreed.</p> <p>ACTION: Update Policy to reflect new class order</p>
<p>Policy BET2 Page 73</p>	<p>Would like to see more small businesses such as craft workshops to increase the number of people working in the village.</p>	<p>Charmouth Traders</p>	<p>The CNP has recognised this need and has included Policy BET2 to hopefully encourage new small scale businesses into the village. In VS Q37 there were several suggestions e.g. workshops.</p>
<p>Policy BET2 Supporting the local economy p 73</p>	<p>Comments received refer to this policy addressing the criteria for new businesses and buildings but suggesting consideration should be given to extending this to the relocation of existing buildings, for example the Old Cement Works Building. It was also pointed out there would be considerable impact on the local economy if the CHCC became less successful and it was in the interest of the Parish Council and other local businesses to give</p>	<p>57677 57848</p>	<p>Agree with your comments and will amend BET2 to include 'relocation'.</p> <p>Please note 3<sup>rd</sup> bullet point(criteria) already says: Where new buildings are proposed, the premises are to be small in scale (under 100sq.m (1076sq.ft.) gross floor area and not exceeding the equivalent of 2 storeys in height) and a restriction is applied to prevent their future conversion to non-employment uses. Under exceptional circumstances, a larger (in</p>

	<p>continued support to the viability of CHCC. Impact of the pandemic could result in a reduction of holiday makers which will have significant impact on the financial viability of CHCC.</p>		<p>size) building may be considered if demonstrated that it has significant benefits to the village community. ACTION: Amend introductory sentence to include relocation of premises. Regarding CHCC's second point, the benefit of CHCC is recognised and consider is value is reflected in CNP in particular Policy AA1. Your comments on the financial viability of CHCC and its link with local businesses are noted. Although CNP cannot resolve this, the intent of the Plan is to help retail outlets and businesses be self-sustaining and to continue to attract tourist and visitors. The policies we have proposed aim to do this.</p>
<p>Policy BET3 Page 73</p>	<p>If there are particular rural buildings within the NP area that are envisaged here, they should be informally checked to see if they should be added to the list of non-designated heritage assets and/or are in the curtilage of listed buildings. The latter will bring its own restrictions as they would be covered by the listing, but if the buildings are historic farm buildings of any merit, then wording might need to be added to this effect in another bullet point: 'Harm to their significance as historic farm buildings is avoided or minimised.'</p>	<p>Dorset Council</p>	<p>There are no particular rural buildings that we have in mind. Agree with your last statement regarding historical farm buildings and will amend the policy to include this statement. ACTION: Policy wording amended.</p>
<p>Policy BET3 Page 73</p>	<p>For the same reasons set out above in our comments to Policy BET1 this policy will require updating to reflect the latest changes to the use class order or simply avoid any reference.</p>	<p>Dorset Council</p>	<p>Yes agreed. ACTION: Policy amended to reflect new class order.</p>
<p>Paragraph 7.32 Page 73</p>	<p>The supporting text at paragraph 7.32 makes references to Local Plan Policy ECON4 but we think</p>	<p>Dorset Council</p>	<p>Yes you are correct this is an error. ACTION: Text amended to read Policy SUS3.</p>

	this should be Policy SUS3 which relates to the adaption and re-use of buildings outside DDBs?		
Section 8 Housing General	General support for the housing policies	57708 57784	Thank you for your support.
General	Concerns that recent Government announcements to simplify planning and increase house building could undermine the Plan's policies.	56027 57618 57752	These comments may have been stimulated by media articles on recent relaxations of Permitted Development Rights (PDR) and the Government's 'Planning for the Future' consultation. This consultation identifies an on-going role for neighbourhood plans and therefore their role as part of the statutory Development Plan in determining planning applications. Also, Charmouth should be classified as a 'Protected Area' with limited changes to the application process. Most of the recent changes to PDR do not apply in AONBs.
H1 General	Unclear whether all bullet point criteria must be met	Dorset Council	ACTION: Re-order bullet points and clarify by adding 'or' or 'and' to relevant bullets.
H1 General	Comments that support was provided for the Charmouth Village Plan which considered 20-50 extra houses as appropriate to support trade.	Charmouth Traders	Extra new homes have been delivered since the 2010 Charmouth Parish Plan (typically 3 p.a.) and this new Plan is now based upon a minimum requirement of 44 additional houses over the next 15 years and therefore sustains the ambitions of the Parish Plan.
H1 General	Support so that Charmouth's character is not destroyed by large scale, edge of village development	57752	Thank you for your support.
H1 General	Excellent	57865	Thank you for your support.
H1 Bullet 1	Concern that policy may be unnecessarily restrictive to 1-3 bedroom homes compared to Local Plan	Dorset Council	Thank you for your qualified support and we note that the use of 'should' may provide scope for this policy.

	SUS2 ii) but, because the policy states 'should', indicates there may be scope for such a policy		However, there is a misinterpretation; 'small' refers to the relative size of the site and is not in italics and therefore is not, as stated, a defined term in the Glossary and therefore does not necessarily restrict small sites to 1-3 bedroom homes. However, these are Charmouth's needs and would therefore satisfy the Local Plan Policy SUS2 ii) reference, which is predicated on meeting the needs of a local area.
H1 Bullet 2	Wish to see the Local Plan list of exceptions outside the DDB included.	Dorset Council	ACTION: Amend policy and describe in the text the other Local Plan housing exceptions.
H1 Bullet 2	Suggestion of a site outside the DDB which could be requisitioned for housing.	57367	This Plan has no powers to requisition land but can consider a proposal for a rural exception site adjoining the DDB. In addition, an Affordable Housing Project (Appendix G) is identified to examine any opportunities.
H1 Bullet 3	Consider the maximum 20 unit criteria on rural exception sites to be in general conformity with Local Plan.	Dorset Council	Thank you for your support.
H1 Bullet 4	Support for policy, but replace 'Starter Homes' with 'First Homes'	Dorset Council	Thank you for your support. ACTION: As starter homes and first homes appear to be different 'products', amend 'starter homes' to 'starter/first homes' and amend Glossary definitions.
H1 Bullet 4	No evidence to show that people would downsize.	56623	It is accepted that new smaller homes will not automatically trigger downsizing but re-balancing the overall stock of houses gives scope for this to take place from the on-going turnover of occupants.
H1 Bullet 5	Highlights that brownfield land excludes gardens and requests clarity on where the policy applies.	Dorset Council	ACTION: Add garden exclusion to definition of brownfield in the Glossary. Amend policy to clarify brownfield site policy applies across the Parish. Note added to paragraph 6.61.

H2 General	Particularly agrees with H2	57784	Thank you for your support
H2 General	Support for affordable homes for people with a Charmouth connection.	56743 Paper 4	Thank you for your support.
H2 Bullet 1	Welcomes policy, but suggests replacing 'Starter Homes' with 'First Homes'	Dorset Council	Thank you for your support. ACTION: As starter homes and first homes appear to be different 'products', amend 'starter homes' to 'starter/first homes' and amend Glossary definitions.
H2 Bullet 2	Considered to be in general conformity	Dorset Council	Thank you for your support
H2 Bullet 2	Surprised at need for 35% more affordable homes	Paper 3	The policy does not mean 35% more affordable homes; the Local Plan requires 35% of new homes to be affordable and CNP is obligated to conform with this policy.
H2 Bullet 2	Support for 3+ threshold requiring on-site affordable homes but concerned this may be a disincentive to developers.	57864	Thank you for your support. It is felt that, due to Charmouth having only a few small infill sites, even small new developments must make a contribution to the affordable housing need.
H2 Bullet3	Concern that allowing market housing could increase land value and reduce affordable housing on rural exception sites.	Dorset Council	We have been unable to find evidence of this happening in practice in Dorset. The current 100% affordable homes policy has not yielded any recent schemes in Charmouth so we see little risk and therefore provide the opportunity to stimulate developer interest.
H2 Bullet 4	Suggest flexibility rather than capped	Dorset Council	Agree. ACTION: Replace 'will' with 'should'.
H2 Bullet 5	Supportive	Dorset Council	Thank you for your support.
H2 Bullet 6	Broadly supportive but preference is for local marketing of 4 weeks.	Dorset Council	Thank you for your broad support. Due to the Council's concern an earlier draft with a 13 week marketing period was reduced to 8 weeks in the



			Consultation Plan. Since that Plan, the Government's response to its First Homes Consultation endorses the local connection principle and permits local marketing for a period of 3 months and this Plan should be 'future proofed' for this initiative. Affordable housing is predicated on meeting identified local needs so a local marketing period should not represent a risk of voids. ACTION: Amend marketing period to 13 weeks if the home has a purchase component (recognising the time to raise finance etc), otherwise 8 weeks for rental only.
H2 Bullet 6	Prefer the Charmouth Connection criteria to be the Council's standard definition.	Dorset Council	LP HOU 2 is not a Strategic Policy but, in any case, its supporting text allows for housing needs to be defined at the parish level and prioritised for those people with a local connection. This connection definition therefore conforms with policy but clarifies the operational delivery of Charmouth's specific housing needs to local people. It is unlikely that Dorset-wide criteria would reflect Charmouth's specific needs and priorities which this policy now provides.
H2 Bullet 7	Supportive	Dorset Council	Thank you for your support.
H3 General	Support these restrictions so that any new housing meets Charmouth's needs	57752	Thank you for your support.
H3 Bullet 1	Principal residency policy could have an unintended consequence of increasing pressure on existing stock to be used as second homes should be considered.	Dorset Council 56623	The data evidence and community support for this policy is considerable. This concern has been considered i.e. the experience in Cornwall where use of such a policy is most extensive. We have not found any firm evidence to underpin this concern and

			neighbourhood plans there continue to include such a policy indicating this issue is not expected to have unintended consequences. The 2021 Dorset Local Plan Consultation includes a Background Paper on Second Homes which is inconclusive on the impacts of such a policy (from a county-wide perspective). However, the Paper indicates such a policy may be more effective at the neighbourhood plan level based on localised data and it confirms the relatively high levels of second homes in Charmouth.
H3 Bullet1	Support for control of second homes/principal residency policy	Charmouth Traders 56746 57708 Paper 4	Thank you for your support.
H3 Bullet 1	Concern whether this policy will make a significant difference, whether it recognises that second homes/holiday lets generate local trade and may send a message that owners of such properties are not wanted.	56623	This policy applies to new homes and would not directly impact existing owners. The number of second homes is impacting on Charmouth as a sustainable community and there is support for such a policy (including from Charmouth Traders) and every opportunity needs to be taken to increase the number of permanent residents. As many holiday destinations now have primary residency policies, it is not thought that such a policy would highlight a negative message e.g. experience in Cornwall has not discouraged seaside neighbourhood plans from continuing to include such policies.
H3 Bullet 2	Concerns that the restriction is unnecessarily restrictive, particularly to market housing.	Dorset Council 57618	Noting the Council's earlier concerns, this policy removed its application to new market homes inside the DDB (and does not apply to any existing homes).

			<p>Its application is only on homes on rural exception sites, permitted exceptionally to meet local needs i.e. for affordable homes and potentially market homes allowed exceptionally to facilitate affordable home provision. As Charmouth's needs are for small homes, we believe that once such homes are created, it is essential that this scarce stock is protected for on-going benefits. We estimate the PDR-related restriction still permits an extension of up to 40% of internal floorspace. Therefore, we do not accept this policy is unnecessarily restrictive; rather it strikes an appropriate balance between meeting a long-term need for small homes whilst providing flexibilities for current occupiers. We also note that, in the 2021 Dorset Local Plan Consultation, the Council may consider removing PDRs to keep some exception site houses small. Charmouth's policy reflects this strategy, but would be less restrictive. ACTION: replace the existing reference for side extensions up to national PDR limits (amended in Sept 2020 but not applying in AONBs) and restate the dimension criteria of the previous PDR as they apply in an AONB.</p>
H3 Bullet 2	Concern that policy is based on PDR limits which the government is continually changing	57752	ACTION: Policy to be amended as above.
H3 Bullet 2	Concern over application of this policy to holiday lets/second homes and consideration given to their exclusion	57802	The relevant part of this policy only applies when there is an application to remove a holiday let restriction (not existing second homes). The various issues raised relate to one particular holiday complex but this policy applies parish-wide where circumstances will differ. Comments relate to the

			suitability of holiday lets as permanent residences but para 8.24 already makes clear that not all premises will be suitable. Also, many comments relate to construction, Building Regulations and landlord/tenant matters which are out of scope of CNP. ACTION: extend the explanation of possible reasons why a property may not be suitable as a permanent residence in para 8.24.
H3 Para 8.23	Querying figures relating to the Census data of 'no usual residents'.	56623	Para 8.23 describes overall changes in the total housing stock 2001-11 and the net effect was very few additional permanent households.
H4 General	Supports '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'.	Dorset Council	Thank you for your support. Therefore, surprised that Bullets 8 & 9 (below) which explain how density and massing is to be managed and be in keeping with its locality with regard to replacements and infill, are then thought to be unnecessarily restrictive.
H4 General	The Conservation Officer suggested adding some design parameters e.g. form, scale, massing, materials, local distinctiveness.	Dorset Council	We believe that Policies H4 & H5 provide adequate guidance on these matters.
H4 Bullet 1	Clarification of 'village feel'	Dorset Council	ACTION: Remove phrase from the policy and provide fuller description of characteristics in supporting text, para 8.27.
H4 Bullet 2	Welcome definition of 'immediate locality'.	Dorset Council	Thank you for your support.
H4 Bullet 3	Agree	Dorset Council	Thank you for your support.
H4 Bullet 4	Agree	Dorset Council	Thank you for your support.
H4 Bullet 5	Agree	Dorset Council	Thank you for your support.

H4 Bullet 5	Concern that gardens with 10+ m. gardens are not being provided (ref para 8.30)	56623	Policy requires rear garden space to be commensurate with the size of property; the 10 m. reference in para 8.30 is provided as guidance.
H4 Bullet 6	Agree	Dorset Council	Thank you for your support.
H4 Bullet 7	Agree	Dorset Council	Thank you for your support.
H4 Bullet 8	Concern that policy is unnecessarily restrictive and conflicts with Local Plan Policy SUS 2 ii), it restricts occupiers changing circumstances and that planning policies should support efficient use of land.	Dorset Council	This policy bullet point only relates to the replacement of existing houses; not extensions as indicated. We believe it is rare for a house to be demolished/replaced to meet the existing occupiers' changing family circumstances which would normally be met by extensions and this Plan places no additional restrictions on extensions to existing homes. Many replacements come about when an old small house comes on the market and is replaced by a much larger house (often a second home) of inappropriate scale to its neighbours. SUS2 ii) is predicated on meeting 'the needs of the local area' and the unrestricted flow of larger replacement homes does not meet Charmouth's needs for small homes (Policy H1) and therefore does not satisfy SUS2 ii). Therefore, we believe the Bullet conforms with SUS2 ii)'s local needs criteria. Also, NPPF para 77 confirms that rural housing policies should be responsive to local circumstances and reflect local needs. The policy does provide reasonable flexibility by allowing the replacement to be the existing size plus PDR allowance which could allow for up to 40%

			larger replacement. Therefore, we do not accept that the Policy is unnecessarily restrictive because expansion flexibilities exist and the policy includes 'should' and therefore it is open to the applicant to make a compelling case why a development outside these restrictions would be more beneficial. The efficient use of land aspect is addressed in Bullet 9 below where additional homes can be considered and para 8.31 confirms these could reflect nearby areas of higher density. The Plan's support for infill and 1-3 bed homes are likely to be at higher densities. ACTION: Replace the one use of 'will' with 'should' and clarify in the text how 'should' is to be interpreted in the case of replacement houses.
H4 Bullet 8	Concerns that existing properties are being developed into large inappropriate dwellings	Paper 3	This policy aims for an appropriate scale of replacement housing compared to the house it replaces and Policy H4 overall aims for development to be in keeping with its immediate locality.
H4 Bullet 8	Considers that if a replacement house meets the first seven bullet points then this restriction on size is unnecessary	56623	The first seven bullet points apply to all housing developments and Bullet 8 is felt necessary for the specific instance of a replacement property. Bullet 8 takes the criteria in the opening sentence of Policy H4 (scale, height, mass etc) as they relate to the former property and these set the context for the size of the replacement. This will be a case by case assessment but will help ensure that the replacement house is in keeping with its immediate locality.
H4 Bullet 9	Concern that policy is unnecessarily restrictive and conflicts with Local Plan Policy SUS 2 ii) and redevelopment of infill plots within the DDB should	Dorset Council	The Plan, e.g. paras 8.9 & 8.28, makes clear that infill will continue to contribute to new housing and therefore we agree that this is not 'exceptional'.

	not be an exceptional circumstance.		<p>This policy bullet addresses situations where a house sits on a disproportionately large plot and enables efficient use of land by allowing additional infill housing if the plot is of a size that can sensibly accommodate more houses. SUS2 ii) is predicated on meeting local needs and Policy H1 makes clear that Charmouth’s needs are for small (affordable) houses and therefore infill of this type would normally be supported inside the DDB and represents optimum and efficient use of land. Regrettably, a lot of recent infill has resulted in large houses and second homes which do not meet local needs and therefore does not satisfy SUS2 ii). This Plan aims to control this type of housing which would then retain infill opportunities for smaller houses. The Plan confirms that new infill housing can reflect densities in the immediate locality which could be relatively high densities (ref para 8.31) and in its H4 General comments above, the Council supports the Plan’s focus on managing density and massing impacts ensuring they complement the immediate locality. NPPF (para 122 d) indicates that, in achieving appropriate densities and efficient use of land, policies should take into account the desirability of maintaining an area’s prevailing character and setting (including residential gardens) and we believe policy bullets 8 &amp; 9 are consistent with this approach. ACTION: Remove ‘exceptionally’ from the policy. Amend Built 9 to clarify it applies to an existing house, whether retained or replaced.</p>
H4 Bullet 9	Policies H1 & H4 do not encourage replacement of	56623	This policy considers additional houses on

	one house with two houses which would provide benefits.		disproportionately large curtilages which could include a situation where a large property is being demolished and the whole site being re-developed with smaller homes. ACTION: Amend Built 9 to clarify it applies to an existing house, whether retained or replaced.
H5 General	Supports the aim of this policy. Reference to Lifetime Homes Standard is dated and welcome use elsewhere of more general wording	Dorset Council	Thank you for your support. We accept the comment on Lifetime Homes Standard. We also note the Government's 'Planning for the Future' Consultation which envisages an increased role for design guides. ACTION: Replace Lifetime Homes Standard with more general wording and remove from the Glossary.
H5 General	Supports the approach based on design principles rather than a design guide but notes the Government sees an increased role for design guides	57752	Thank you for your support. Unfortunately, it is not possible to incorporate a reference to these design guides in policies as they do not exist and therefore have not been consulted upon. ACTION: make reference to potential future design guides in para 8.33
H5 Bullet 7	Justify car parking standards	Dorset Council	ACTION: Relocate policy bullet to GA2 where justification of car parking issues is stated.
GA1 Bullet 1	Dorset Council welcomes reference to a map of existing and closed footpaths.	Dorset Council	Thank you
GA1 Bullet 2-6	Dorset Council supports the aims of each of these criterion. The policy may benefit from further sub headings; for example existing pedestrian routes and new pedestrian routes.		Thank you for your support. Yes we originally had the subheadings you described but changed as one of the bullet points applied to both new and existing. However on reflection we think your suggestion would be better, so we will amend the wording in the policy to suit. ACTION: Sub headings added to Policy GA1
Section 9 Page	A suggestion was made to make the footpath, from	Paper 2	Thank you for your comment which will be passed



100	Wesley area to River Way in Map 9.2., suitable for mobility scooters by dropping the kerb stone and removing the centre pole, providing better access to the beach, rather than going up to Lower Sea Lane.		onto the Parish Council. ACTION: Comments passed on to CPC
GA2 Bullet 2	Bullet point 2, It is not clear what 'existing premises' refers too? It is assumed non-residential. It is also not clear what 'on street roads' is a reference too? Is this drop kerbs? The proposed policy would seem to partly conflict with Government aims to optimise development densities although maintaining adequate parking provision is also a key objective.	Dorset Council	Existing premises refers to both residential and non-residential, we will amend the policy to read 'sites' and clarify the intent in the supporting text. Yes, this was meant to include drop kerbs or any development that reduces parking provision on roads and streets, as this is such a premium in Charmouth. We will clarify the supporting text. ACTION: Amend Policy to include 'sites' and clarify in text. Regarding car parking requirements (as above under H5 Bullet 7) please note: A new bullet point 3 has been added; car parking provision for new houses, which has been transferred from Policy H5 previously bullet point 7. Justification is given in the preceding text. In an email of 31 July 2018 Dorset Council said that you had spoken with the Highway Authority and that they thought 2 car parking spaces per unit was sensible so we are surprised that this point has been raised. So no change has been made to this particular policy.
GA2 page 101	Concern was raised about car parking being inadequate in busy summer months, causing problems for residents with residential roads becoming blocked and gaining access to their properties becomes difficult. Suggestion was made	56743	The problem of car parking in summer months is recognised within CNP, hence the inclusion of GA2 to protect existing carparks and the loss of parking spaces. Regarding your comment on parking restrictions and

	<p>that parking restrictions should be imposed in these areas.</p> <p>Main carpark used to have an attendant to supervise parking during bust times, maximising the number of cars able to park; this should be re-introduced.</p>		<p>car park attendant this will be passed onto the Parish Council.</p> <p>One of the Projects in Appendix G, is a Transport Project which includes parking issues in the village as there were many comments on this subject in the Village Survey. We hope this initiate will be taken up by a working group.</p> <p>ACTION: No change to policy but comments passed onto C.P.C.</p>
Para 9.41 page 101	A suggestion was made to reinstate more frequent bus service and also evening and late evening (10pm) allowing return from Lyme, avoiding use of private cars.	58351	Your comment is noted and this could be taken up by a working group as this is outside the remit/scope of CNP. One of the Projects identified in Appendix G, is a Transport Project which could be expanded to include bus services.
Chapter 10: Energy Efficiency and Coastal Change	Natural England supports the recognition of the SMP within the text of this chapter and the natural coastal change processes that carry through to policy CC2 (Coastal Change and Flooding).	Natural England	Thank you for your comments and support.
p104 to p110, 10.16 to 10.38	<p>Concerns received pointing out that South Devon and Dorset Coastal Advisory Group has advised that existing coastal defences will no longer be maintained after 2025 and when they fail will be removed. Concern also expressed about the impact upon the village economy.</p> <p>It was also highlighted that the NP supports improvements to coastal defences and this was in conflict with the South Devon and Dorset Coastal Advisory Group.</p>	57848 57677	<p>Yes it is recognised that SDADCAG's view appears to be in conflict with the aims of the Plan, but SMP2's lack of provision of any coastal defence starts from 2025 thus allowing for action in the interim.</p> <p>It is important that your views and those of others are reflected in bringing forward Policy CC2 to encourage engineering development to create some improvement to coastal defences at least up to 2025, and preferably thereafter.</p> <p>2025 is not far away and CC2 aims to gain protection for the area in the interim, and thus hopefully the</p>

			<p>future of the village economy. Charmouth Traders have recognised the dangers to the village of the effect of losing defences and have produced a paper detailing the consequences.</p> <p>A Coastal Project in Appendix G has been outlined to explore different options for coastal defences.</p> <p>ACTION: Policy CC2 and supporting text have been amended to clarify this.</p> <p>ACTION: Further information provided by Charmouth Traders in CNP.</p>
Policy CC1: Energy Efficiency	<p>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.</p> <p>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. Dorset Council published its first draft Climate and Ecological Emergency strategy online within the agenda of the Place Scrutiny meeting held on 23 July.</p> <p>The strategy identifies eight topic areas (renewable energy, buildings and assets, food and drink, economy, waste, water, natural assets, transport) and for each section there is a discussion with key areas of action. These topics will be used to frame the delivery plan. Several of the actions are</p>	Dorset Council	Thank you for your comments and support.

	<p>considered for inclusion within the emerging Dorset Local Plan and could potentially be adapted for the Charmouth Neighbourhood Plan. It is proposed to consult the public on the draft strategy and delivery plan together later this year.</p> <p>The Council's Conservation Officer adds the following comment.</p> <p>Policy CC1, p. 104: A <i>caveat</i> should be added here to the effect that applications for new buildings with solar panels etc. or applications for retrofit will be subject to an assessment of their impact upon heritage assets (e.g. the Conservation Area) and their settings.</p>		<p>Paragraph 10.9 has been updated accordingly. ACTION: Text amended.</p> <p>Policy CC1 has been amended to include an additional bullet point to reflect your comments. ACTION: Policy CC1 amended.</p>
Policies CC1 - CC2 pp104 -111	Support given to these policies particularly on mitigating the effects of climate change.	57784 57865	Thank you for your comments and support.
Policy CC1: Energy Efficiency Page 104	Support given but concern raised about new development being expected to reflect climate change through design and wouldn't this result in new homes being more expensive. Surely increased initial costs will reflect on affordable housing costs.	57409	Affordable Homes are priced at 80% of local market prices so occupants should not incur increased costs and should benefit from on-going energy savings. There is a potential risk that increased construction costs could dissuade a developer/housing provider but it is felt that, in line with Government policy, new homes should be energy efficient and should be a relatively small cost if installed at the outset.
CC1 Energy Efficiency and Coastal Change p 104	<p>Comments received from the Trustees of the CHCC outlining the purpose, benefits and risks to the CHCC. Key issues identified include:-</p> <ul style="list-style-type: none"> <li>- Need to protect shoreline assets, amenities, buildings and services.</li> <li>- The economic impact at the Centre and the local</li> </ul>	57677	<p>Thank you for your comments concerning the purposes and benefits the CHCC brings to Charmouth. All the points made are covered within the CNP.</p> <p>It is recognised that there is a difficult balance between allowing erosion to continue yet protecting</p>

	<p>community due to failing coastal defences.</p> <ul style="list-style-type: none"> <li>- Risk to the Coast Centre and its ability to fulfil its Charity remit.</li> <li>- Importance that its work has to be undertaken close to the foreshore; so protecting the Factory Building should be priority.</li> <li>- Look to a long term solution, should the building be destroyed beyond repair, but would need to be a Parish Council and community project.</li> </ul>		<p>the shoreline assets around Charmouth.</p> <p>The risks of failing coastal defences upon CHCC are well understood and that is why Policy CC2 has been included, and why a Coastal Project in Appendix G has been proposed to explore different options for coastal defences.</p> <p>ACTION: Cross reference made in paragraph 10.12 to Table 5.1 asset A1.</p> <p>ACTION: Project 2, (Coast) updated.</p>
<p>Policy CC2: Coastal Change and Flooding</p>	<p>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.”</p> <p>The NP summaries the report’s conclusion under two bullet points.</p> <p>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</p>	<p>Dorset Council</p>	<p>Thank you for your comments. Text has been added to paragraph 10.16 relating to your statement.</p> <p>ACTION: Text added.</p> <p>Policy CC2 has been updated and points re Coastal Defences and Coastal Relocation have been separated.</p>

	<p>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.</p> <p>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.”</p> <p>In this context bullet points 1 and 2 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.” and “Priority has to be given to the significant improvement of Charmouth’s coastal defences rather than any relocation of premises or services.”</p> <p>However both points appear not to acknowledge the agreed SM2 position that it is “technically</p>		<p>The more detailed appendix (link found in AppE) on Foreshore Impact should also be read in this context.</p> <p>It is considered the significant economic impact on Charmouth, and by extension, the surrounding area, with loss of tourism, properties, jobs etc. is a forceful and compelling argument. Part of Chapter 10 has been expanded to explain further, and the more detailed appendix on Foreshore Impact (link found in AppE) should also be read in this context.</p> <p>The time between now and 2025 when SMP2 comes into effect is surely a time when work could be considered.</p>
--	--	--	---

	<p>difficult to maintain defences in the existing position” and no compelling justification is currently given to why coastal defences should be maintained other than the significant economic impact. Dorset Council are therefore concerned that the proposed policy would undermine the agreed strategy for Durlleston to Rame Head outlined within the Shoreline Management Plan 2.</p> <p>Bullet point 3 supports the relocation of coastal premises and services only if necessary and to an appropriate location. This approach is considered to be in general conformity with 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.”</p> <p>Bullet point 4, helpfully outlines where relocated housing would be suitable, within DDBs or where no suitable site exists, outside DDBs as a rural exception site or as a brownfield site. The policy text crosses references to Policy H1 however this policy only outlines the Plan’s general approach to housing and does not specifically mention housing affected by coastal change. Supporting paragraph 8.10 does however state “In the longer term, sites may need to be found to relocate properties affected by coastal change or flooding (see Chapter 10). LP-ENV7ii provides support for such a policy</p>		<p>The Coast Project has been suggested to address this issue.</p> <p>Regarding bullet point 4, your comments are accepted and Policy CC2 amended to remove references to H1 and rural exception site and replaced with ‘... a site <i>adjoining</i> the Defined Development Boundary...’ The defined term <i>adjoining</i> has been amended in the Glossary so it no longer exclusively relates to rural exception sites and now provides the equivalent locational criteria for this coastal relocation policy (which will involve properties other than housing).</p> <p>Policy CC2 refers to relocation of <b>premises</b> on the basis that the first properties affected are unlikely to be housing so properties/premises encompass more than housing.</p> <p>ACTION: Policy and Glossary amended</p>
--	--	--	--

	<p>within a defined area agreed through a community relocation strategy and this Plan takes the opportunity to define appropriate locations.” Although this clarification is welcomed it might be helpful to include a statement on coastal change relocation in the policy text as suggested by the cross reference.</p> <p>Bullet point 5 states “exceptionally, an appropriate site anywhere in the Parish can be considered if replacing an important community asset or amenity.” The policy does not clarify what the exceptional circumstances are? Although it is assumed by virtue of the policy title to be coastal change or flooding. Dorset Council do not object to the principal of this policy would suggest that additional caveats are added to the policy for example to exclude areas of high environmental value or other areas in imminent risk of land slippage. This point is particularly important in the context of the Habitats Regulation Assessment and some of the conclusions summaries by paragraph 10.37.</p> <p>As a general point in which to aid the reader it is suggested the policy is divided into two under two sub headings. Bullet points 1 &amp; 2 work together to discuss ‘Coastal defences’ and bullet points 3-5 discuss ‘coastal relocation’.</p>		<p>‘Exceptionally’ has been removed from the policy.</p> <p>Bullet points 4 and 5 now both include the fact that relocation would be due to damage or flooding caused by coastal change.</p> <p>To address the point re caveats to exclude areas of high environmental value or other areas in imminent risk of land slippage, please see Policies within Chapter 6 which provide the detail. Paragraphs 2.3, 2.4 and 2.7 make it clear that all CNP policies should be read in conjunction with all other CNP policies, as well as LP policies.</p> <p>ACTION: Policy CC2 text amended.</p> <p>Thank you for your suggestion and the policy has now been divided into two headings. ACTION: Policy CC2 amended.</p>
--	---	--	--



<p>CC2: Coastal Change and Flooding –Page 111</p>	<p>Comments were raised concerning the emphasis on strengthening sea defences before considering managed realignment, giving the impression something significant can be done to prevent long term sea encroachment. Reference was made to the cliffs around Lyme and the engineering challenge that brought but this would be more difficult in Charmouth. Also rising sea levels could lead to flooding resulting in damage to properties and possible loss of life. Some flood defences possible along the river could be considered so the emphasis should be on switching to managed realignment in the lower parts of the town.</p>	<p>57865</p>	<p>Thank you for your comments. As stated in chapter 10.16 item (b) some form of protection up river may be forthcoming and allowance for such impact upon housing has been provided in Policy CC2 (bullet point 4).</p> <p>Whilst strengthening sea defences may be technically challenging it is not necessarily impossible. This issue has been included in the CNP as there is currently no proposal after 2025 to put in place any defences or any improvement to existing defences. The effect of not having coastal protection is examined throughout this chapter.</p> <p>Some protection for the area up-river may be provided some time after 2025. This should protect part of the village, but without defences of some sort at the coast, it is anticipated that the village economy will suffer considerably with serious effects on the community.</p>
<p>Policy CC2 page 111</p>	<p>Reference was made to the policy regarding ‘engineering initiative to significantly improve existing coastal defences or create new coastal defences..... etc.’</p> <p>Suggestions were made to include an assessment of financing coastal defences in light of the South Devon and Dorset Coastal Advisory Group report. Also suggested that the NP should encourage new attempts to find a suitable relocation for the Old Cement Works Building.</p>	<p>57848 57677</p>	<p>Thank you for your comments.</p> <p>Improving coastal defences and finding a new location for the Old Cement Works building is outside the remit of the CNP. However your proposal is valid and that’s why it has been included as a project within Appendix G, item 2 Coast Project.</p> <p>The ‘DEFRA Coastal Change Pathfinder Project’ of 2011 considered various options for relocation of CHCC/the Old Cement Works Building. See answer under AA1.</p>

			<p>In 2020 Charmouth Parish Council issued a Report on DEFRA Coastal Change Pathfinder Programme, a reference is found in Appendix E and is supporting document.</p> <p>ACTION: Project 2, (Coast) updated.</p>
Policy CC2 p 111	<p>Comments were received supporting engineering initiatives to significantly improve existing coastal defences or create new coastal defences, emphasising this had priority over relocation of premises and services. Relocation of coastal premises or services will be supported only if absolutely necessary and in an appropriate location.</p>	<p>57677 56746 57758</p>	<p>Thank you for your comments and support.</p> <p>Regarding relocation of coastal premises or services we consider this has been included within Policy CC2.</p> <p>Improving coastal defences and finding a new location of the Old Cement Works building is outside the remit of the NP Steering Group. However the validity of your proposal and its funding is recognised and it is therefore included as a project within Appendix G, item 2 Coast Project.</p> <p>ACTION: Project 2, (Coast) updated, will include reference to funding</p>
CC2 page 111	<p>Comment made that coastal change was inevitable due to nature.</p>	<p>56743</p>	<p>It is recognised coastal change is largely inevitable although climate change has a key part to play in this, but there are things we can do locally, nationally and internationally.</p> <p>There is a difficult balance between allowing erosion to continue and protecting at least part of the coast around Charmouth, hence the inclusion of Policy CC2.</p>

Section 11 Implementation & 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.	Dorset Council	Thank you for your comments and support.
Section 11 p112	Support was given to the Creation of a Community Land Trust for the succession, continuity and overseeing development of the CNP.	57367	Thank you. As explained in Appendix G under 'Background', this Project will require volunteers to develop these points.
Appendix G Coastal Project Page 134	Supports Charmouth Coastal Community project and suggested the project team could lobby for government funding to compensate owners for loss or damage to properties and relocation expenses.	57865	Thank you for your comments.  ACTION: Include reference to possible funding in update of Coast project in Appendix G
Appendix G Sports and Recreation Project Page 135	Suggested the provision of a running track in the recreational ground. The respondent has experience in delivering athletic activities to children and offered professional expertise for such a project.	57562	Thank you for your comments and the offer of support. You will note that Sports and Recreation Project was identified in Appendix G which could well include this facility. We will pass your comments on to the Parish Council. ACTION: No change to text but pass on comments to CPC.