

Charmouth Neighbourhood Plan - Submission Plan Representation Summary

Charmouth Parish Council submitted the final version of the Charmouth Neighbourhood Plan (2021) to Dorset Council for independent examination in May 2021. People were given six weeks from 18 June 2021 until the end of Friday 30 July 2021 to comment on the content of the plan or how it was produced. At the close of the public consultation nine representations were received. A further representation was received late from the Environment Agency.

Rep ID	Respondent	Summary
1	Blandford Forum Town Council	The Town Council notes the submission consultation and notes that there is no material impact on Blandford Forum.
2	Charmouth Neighbourhood Plan Steering Group	<p><u>Policy NE4 Local Green Spaces</u></p> <p>Map 6.5 and Appendix (Additional Maps)</p> <p>Following a letter from the National Trust dated 26th June 2021, regarding the designation of LGS2, the Steering Group of Charmouth Neighbourhood Plan would like to amend the maps, showing LGS2, to reflect the correct designated area as shown in the map supplied by the National Trust (hatched area). This would then align with the land owned by the National Trust.</p>
3	Dorset Council – Spatial Planning & Conservation	<p><u>Introduction</u></p> <p>This is a combined response with comments from both the Council’s Community Planning and Conservation Team’s.</p> <p><u>Revised NPPF 2021</u></p> <p>On the 20 July 2021 a new National Planning Policy Framework (NPPF) was published replacing the previous revised NPPF 2019. We advise that references to the NPPF 2019 should be updated throughout the Neighbourhood Plan.</p> <p><u>Plan Period</u></p> <p>Dorset Council support the proposed Plan period 2021 – 2035 on the front cover of the Plan which offers a 14 year time horizon. We note that the Appendix A: glossary suggests an alternative plan period of 2020-2031 and advise this discrepancy is resolved.</p> <p><u>Maps</u></p> <p>In earlier drafts of the Neighbourhood Plan, Dorset Council had expressed concerns with the pixilation of some of the maps.</p>

	<p>The updated maps within the Plan are now considered clear and legible for readers. The map appendix is also a welcome addition as this document provides the precise boundaries of all the place-based policies at a higher resolution.</p> <p><u>Protecting our heritage and history</u></p> <p>The Council’s Conservation Officer has been consulted and provides the following comments.</p> <p>In general, it is welcomed that the plan engages with the historic environment in the following broad areas: providing a general historical context for the NP area; summarising the Conservation Area Appraisal; having a heritage-related policy to shape development (Policy HH1); and in identifying non-designated heritage assets.</p> <p>I have had a look through and I can see that they have incorporated almost all my suggestions made at Regulation 14 stage and so I don’t have any further substantive comments to make on the submission version. The only element which appears not to have been taken up is my suggestion of a more extensive search for non-designated heritage assets within the whole NP area (rather than just the CA), e.g. the sections of Old Lyme Hill I mentioned. However, this is not essential as the revised policy wording now better covers heritage assets and, like national policy, leaves the door open for others to be identified.</p> <p><u>Policy HH1: Heritage Assets</u></p> <p>General support for Policy intent.</p> <p><u>Protecting our Assets and Amenities</u></p> <p><u>Policy AA1: Important Community Assets and Amenities</u></p> <p>We welcome table 5.1 which lists 17 ‘locally Important Community Assets and Amenities’ including a justification.</p> <p>Dorset Council support the aim of Policy AA1 in seeking to retain important community assets and amenities by allowing them to modernise and adapt. Given the tightly drawn boundary of Charmouth there may be scenarios where their relocation outside the neighbourhood area can be considered provided the new location is appropriate to its function and the community it serves.</p> <p><u>Protecting our Natural Environment</u></p> <p><u>Policy HRA1: Habitats Regulation</u></p> <p>The Habitats Regulation Assessment screening exercise concluded that there were likely significant effects as a result of the Charmouth Neighbourhood Plan due to Pollution to groundwater (point sources and diffuse sources), human intrusions and disturbances, and urbanisation, industrial and similar activities at the Sidmouth to West Bay Special Area of Conservation (SAC).</p> <p>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.</p>
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	<p><u>Policy BET1: Charmouth's Retail Hub</u></p> <p>Dorset Council is supportive of the Plan's aim to support the protection of existing retail properties as shown on the retail hub map 7.1. Charmouth is not identified as a Local Centre in the adopted local plan (either within paragraph 4.4.4 or glossary under 'local centres') or the Joint Retail and Commercial Leisure Study (2018).</p> <p>Policy ECON4 criterion vi) of the adopted local plan discusses residential development above shops but this criterion is considered non-strategic.</p> <p><u>Policy BET2: Economic Development and Premises for New Businesses</u></p> <p>Dorset Council is supportive of Policy BET2 which seeks to encourage growth of new businesses while protecting the village's special character and its surrounding landscape.</p> <p>The strategic approach set out within Policy ECON1 criterion i) of the adopted local plan includes the general support for employment development within or on the edge of a settlement, there are no size restrictions. The Neighbourhood Plan recognises that there are limited opportunities in Charmouth and therefore where new buildings are proposed, the premises are to be small in scale (100sqm or 1076sq.ft), the equivalent of 2 storey's in height and restrictions applied to prevent further conversion to non-employment uses. The definition of small scale (100 sqm) limit is considered particularly restrictive and it is recommended that this definition should be increased to refer to schemes of up to 500sqm to align better with permitted development rights (for example Class I).</p> <p>Although this policy is considered overall to be more restrictive than Policy ECON1 criterion i) the Council is content that the final paragraph of Policy BET2 bullet point 3 allows for larger buildings under exceptional circumstances, if it is considered that there are significant benefits to the village community.</p> <p><u>Policy BET3: The Reuse of Rural Buildings and Land for Employment Use</u></p> <p>The re-use of farm and rural buildings outside the defined development boundary for small-scale business purposes is support. Adopted Local Plan Policy SUS3 'Adaptation and reuse of buildings outside defined development boundaries' is considered non-strategic.</p> <p><u>Creating Homes for Charmouth's Needs</u></p> <p><u>Number of Houses Required</u></p> <p>Dorset Council is content that paragraph 8.7 is a true reflection of estimated local housing need emerging from the Dorset Council Local Plan – Options Consultation (January 2021).</p> <p><u>Policy H1: New Housing Developments</u></p> <p>Dorset Council understands that the aim of this policy is to support the development of new small houses on small scale sites primarily inside the Defined Development Boundary, to continue Charmouth's historic pattern of organic, small scale growth</p>
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	<p>(paragraph 8.12). Paragraph 8.9 explains that there is some limited scope for small scale infill, redevelopment and sub-division of larger plots if of sensitive design and appropriate density. The Neighbourhood Plan glossary defines small homes as having 1 to 3 bedrooms.</p> <p>Bullet point 1, Dorset Council is concerned that bullet point 1 may be considered unnecessarily restrictive as Local Plan Policy SUS2 ii) states that residential development will normally be permitted. There are no limits of plot size for example. Local Plan Policy HOUS3 Housing Mix states that residential development should include a mix in the size of, type and affordability of dwellings proposed. The Strategic Approach refers to the type, size and mix of housing being expected to reflect local needs as far as possible and result in balanced communities, as reflected in Policy HOUS3, so it is a strategic policy.</p> <p>Neighbourhood Plan paragraph 2.8 offers some flexibility by clarifying the word ‘should’ has a specific meaning in allowing the applicant some flexibility. Within this context there may be scope to include such a restrictive policy approach locally.</p> <p>Bullet point 2 allows for “rural exception sites for affordable housing up to a maximum of 20 units per site must adjoin the Defined Development Boundary and form a logical extension to this Boundary and must not represent a marked intrusion into the countryside.” Local Plan Policy HOUS2 however permits ‘small scale’ sites adjoining settlements. A 20 unit limit could be considered reasonable in the context of Charmouth’s size and could be in general conformity with policy HOUS2.</p> <p>Bullet point 3, Policy ENV15 and Paragraph 2.6.18 of the Adopted Local Plan encourages the re-development of brownfield sites if they are not of high environmental value.</p> <p>Bullet point 4, Dorset Council supports the reference to local housing needs evidence to steer future housing size, type and tenure as well as housing mix. Starter Homes have been replaced by First Homes, however, Neighbourhood Plans are subject to transition periods. It would be helpful if the Neighbourhood Planning Group could clarify their intention in this regard and remove all references to starter homes throughout the Plan, although curiously the NPPF 2021 has not replaced Starter Homes itself.</p> <p><u>Policy H2: Affordable Housing</u></p> <p>Bullet point 1, Dorset Council welcomes Charmouth NP identifying the local housing need priorities. Reference to ‘Starter Homes’ can be removed.</p> <p>Bullet point 1, The Ministerial Statement (24 May 2021) states that “A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes.” Planning practice guidance (Paragraph: 015 Reference ID: 70-015-20210524) clarifies “Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.” In practice this means that First Homes will be prioritised over other forms of affordable housing. Although it is recommended that bullet point 1 be re-ordered to reflect this national policy position with First Homes listed first, the issues raised in our response to Bullet Point 3 may mean that this is not the best solution and that a cross reference to the Government’s First Homes policy maybe more effective. For example, “Where there is discretion within</p>
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	<p>the Government’s First Homes policy, the housing need priorities in the Charmouth area are in descending order:”</p> <p>Bullet point 2 is considered to be in general conformity with Local Plan policy HOUS 1 which seeks 35% affordable housing in West Dorset. Charmouth is located in the Dorset Area of Outstanding Natural Beauty (AONB) a designated rural area. Planning practice guidance (Paragraph: 023 Reference ID: 23b-023-20190901) clarifies that “In designated rural areas planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold”</p> <p>In August 2016 West Dorset District Council agreed to apply changes to the threshold. In designated rural areas, a tariff-style contribution towards the provision of affordable housing, where a housing development of 6 to 9 homes (net) is proposed. In this context Dorset Council is supportive of seeking a lower threshold in Charmouth where justified.</p> <p>Bullet point 3, states “Exceptionally, starter/first and market homes up to a maximum of 20% each type and a combined total of 30% of the total number of units on each rural exception site can be considered where they are essential to a scheme’s viability.” The Ministerial Statement (24 May 2021) clarifies that in designated rural areas, rural exception sites will remain as the sole exception site which can come forward. Charmouth is located within the Dorset AONB.</p> <p>With reference to Rural Exception Sites, paragraph 78 of the NPPF 2021 is quoted.</p> <p>The NPPF, Annex 2 Glossary defines Rural exception sites.</p> <p>In this context, it is not precisely clear how the Government’s First Homes policy interacts with Rural exception sites. It would seem that the local community could choose to prioritise other forms of affordable housing beyond First Homes the Government’s stated priority. This could mean that there is a need for two priority lists for housing in Charmouth; a first list for all housing sites within development boundaries and a second priority list for rural exception sites? As this seems overly burdensome the bullet point 1 list could be supported subject to an additional criterion that cross referenced the Governments First Homes Policy.</p> <p>Bullet point 4, Dorset Council suggest some flexibility is built into this approach rather than ‘capped’.</p> <p>Bullet point 5, Dorset Council is supportive.</p> <p>Bullet point 6, Dorset Council is broadly supportive of the aims of this criterion. Preference is for marketing to run for 4 weeks. The definition of a ‘Charmouth Connection’ is set out in Appendix A: Glossary of the Plan. Although the definition is broadly in line with the Dorset Council definition of a local connection there are slightly differences which for consistency the Council would like to see amended. The Council’s preferred solution is for a cross reference to the Council’s standard definition of Local Connection. This is set out in the Councils Housing Allocation Policy 2021-2026.</p> <p>Bullet point 7, Dorset Council is supportive.</p> <p><u>Policy H3: Benefitting from New Housing</u></p>
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	<p>Bullet point 1, Dorset Council notes the policy approach to restrict new homes under a principal residence condition however, the Council considers that unintended consequences could result from such a policy approach. For example, the policy could put increased pressure on the existing housing stock being bought and used as second homes. Such unintended consequences should be fully considered.</p> <p>Bullet point 2, states that “future extensions which create habitable rooms proposed for housing built after 2020, either on rural exception sites (both affordable and any starter/ first or market homes) or on affordable homes within the Defined Development Boundary, will be restricted.” to the allowance under Permitted Development in designated areas. Dorset Council is concerned that the proposed approach is unnecessarily restrictive, particularly the restrictions that relate to market housing.</p> <p><u>Policy H4: Housing Form and Layout</u></p> <p>Dorset Council is supportive of the Plan’s policy focus on “managing density and massing impacts of new build, re-developments and extensions, ensuring that they respect the building line and complement their neighbouring properties and the immediate locality.” (Paragraph 8.29)</p> <p>Bullet point 1, Policy would benefit from supporting design evidence such as a place appraisal to help the decision making with interpretation of its rural village and coastal characteristics.</p> <p>Bullet point 2, Dorset Council welcomes the local definition of ‘immediate locality’ within the supporting text paragraph 8.29 and Glossary of terms.</p> <p>Bullet points 3 & 4, agree.</p> <p>Bullet point 5, agree. Dorset Council welcome the further clarification in the supporting text paragraph 8.30. This bullet point could include the word ‘should’ given paragraph 8.30 refers to should in numerous places.</p> <p>Bullet points 6 & 7, agree.</p> <p>Bullet point, 8. Dorset Council is concerned that this criterion is unnecessarily restrictive. Policy approach conflicts with Policy SUS2 ii) which states that “within DDBs residential, employment and other development to meet the needs of the local area will normally be permitted”. Government policy allows for extensions to properties to allow for people to live in their own homes in changing circumstances. NPPF 2021 paragraph 124 and 125 are quoted.</p> <p>Bullet point 9. Dorset Council is concerned that this criterion is unnecessarily restrictive. Policy approach conflicts with Policy SUS2 ii) which states that “within DDBs residential, employment and other development to meet the needs of the local area will normally be permitted”.</p> <p><u>Policy H5: Housing Design</u></p> <p>General support for Policy intent.</p>
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	<p><u>Getting around Charmouth</u></p> <p><u>Policy GA1: Pedestrian Routes</u></p> <p>Bullet point 1, Dorset Council welcomes reference to a map 9.1 of existing and closed footpaths.</p> <p>Bullet point 2 -6, Dorset Council support the aims of each of these criteria.</p> <p><u>Policy GA2: Car Parking</u></p> <p>Bullet points 1 & 2, Dorset Council is supportive.</p> <p>Bullet point 3, the proposed approach varies from the standard methodology set out in the Bournemouth, Poole and Dorset Residential Car Parking standards. To justify a higher standard detailed local evidence and justification should be provided. Examiners of other neighbourhood plans in Dorset have not considered it appropriate to deviate from the Dorset wide residential car parking standards.</p> <p><u>Energy efficiency and coastal change</u></p> <p><u>Policy CC1: Energy Efficiency</u></p> <p>General support for Policy intent.</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.</p> <p><u>Policy CC2: Coastal Change and Flooding</u></p> <p>Dorset Council has significant concerns with Policy CC2 and its supporting text in relation to its interpretation of the Shoreline Management Plan and its support for coastal defences rather than coastal change adaptation. The response includes a comparison of the Neighbourhood Plan and Dorset Council positions.</p> <p>Bullet point 1, Proposals to maintain or enhance existing defences would be inconsistent with the management policies in the shoreline management. This bullet point should be deleted.</p> <p>All references within the supporting text that are inconsistent with the Shoreline Management Plan should also be deleted. The Council would highlight the final sentence of paragraph 10.16, paragraph 10.26, the first sentence to paragraph 10.36, the final two sentences of paragraph 10.38 and the whole of paragraph 10.39. Reference to a future Coastal Defence project in paragraph 10.40 should also be considered for removal.</p> <p>Bullet point 2 supports the relocation of coastal premises and services subject to or damaged by coastal change or flooding will be supported if there is no prospect of future improvements to coastal defences to safeguard the premises, and to an appropriate location suitable for purpose. The council supports this part of the policy which seeks to make provision to relocate</p>
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		<p>infrastructure which is likely to be affected by coastal change.</p> <p>Bullet point 3, helpfully outlines where relocated housing would be suitable. You might wish to define any areas which are considered appropriate for relocated development on the policies map.</p> <p>This approach is considered to be in general conformity with adopted Policy ENV7 ii) which states “the replacement of properties affected by coastal change may be permitted within a defined area agreed through a community relocation strategy as an exception to normal policy.”</p> <p>The Council is also supportive of the proposal to prepare a Village Improvement Project within paragraph 10.40 which seems to provide a similar role to a coastal adaption plan. A commitment towards the preparation of a coastal adaption plan within the Policy text would be encouraged and supported.</p> <p><u>Implementation and monitoring of the plan</u></p> <p>Dorset Council welcomes the Parish Council’s intention to annually monitor the Plan following the principals of plan, monitor and manage.</p>
4	Highways England	<p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the A35 which runs through the north of the Plan area.</p> <p><u>Policy NE4: Local Green Space</u></p> <p>Table 6.5 has been amended to reflect previous concerns and states that LGS1 has been removed as a proposed site, however it remains within the table and map and we therefore consider the current wording of Policy NE4 is ambiguous. Either LGS1 should be removed from table 6.5 and Map 6.5 and explained or Policy NE4 needs rewording to explicitly remove LGS1 from the policy.</p> <p><u>Policy NE6: Pollution</u></p> <p>We welcome the inclusion of a requirement for new housing development to satisfactorily assess and mitigate any impacts arising from A35 traffic noise. We would draw attention to the requirements of DfT Circular 02/2013, Annex A, paragraph A1.</p> <p>We would also wish to emphasise 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>
5	Historic England	<p>There are no issues associated with the Plan upon which we wish to comment.</p>
6	Marine Managem	<p>We advise that you take note of any relevant policies within the South Marine Plan documents in regard to areas within that may impact upon the marine environment. Some examples of policies that may be relevant include: Seascape, Infrastructure,</p>

	ent Organisati on	<p>Employment, Heritage and Social. These are provided only as a recommendation and we suggest you make your own determination of which are relevant.</p> <p>You may consider mentioning the South Marine Plan when discussing coastal or marine themes - such as the discussion of Charmouth's Jurassic coastline within the AONB and the Jurassic Coast section. It could also be mentioned under the 'Habitats Regulations Assessment' section.</p> <p>Should you require Marine Licences, please consider signposting to the Coastal Concordat. The Coastal Concordat requires each council to be signed up by 2021, as per the 25-Year Environment Plan: It is good to see that Dorset Council is signed up!</p>
7	Mr R Hughes	<p><u>Policy AA1 Important Community Assets and Amenities</u></p> <p>Table 5.1 Important Community Assets and Amenities</p> <p>The A2 School & A14 Fire Station meets the needs of the wider area, not just Charmouth, describing them as Charmouth assets gives a false sense of ownership.</p> <p>A6 The Elms. This is a large admin building, with excess space wither empty or let because it is not used for community purposes. If the Parish Council should choose to dispose of it they should not be inhibited by this Plan.</p> <p>These three buildings should be withdrawn from the list.</p> <p><u>Policy H3 Benefiting from new housing</u></p> <p>Section 8.22 Principal Residency Condition. The argument for this is flawed. The lack of well paid jobs, the love of city life, house prices in a very desirable village are factors not addressed. The census data on households (8.23) suggests that new housing has yielded few permanent households. It implies only new houses have been bought as second homes.</p> <p>Section 8.24 were this policy in place Holiday let owners would have no incentive to apply. They would assess the commercial value of occupying / renting / selling before making an application assuming the house met the suitability criteria. I believe this policy sends a message to second home and holiday let owners to say they are un-welcome without significantly increasing the number of affordable homes.</p> <p><u>Policy H4 Housing Form and layout</u></p> <p>Paragraph 8.30. There maybe a valid argument that properties should have a safe play area but it is not essential that they are at the rear. There are £1 million plus houses in Charmouth which have small / non-existent rear gardens, but a large safe secure front garden.</p> <p>Bullet point 6. There is no definition of 'general disturbance'.</p> <p>Bullet Point 8. My road contains a number of 1960s retirement bungalows, two of which have been replaced with buildings at</p>

		<p>architectural variety and interest. This policy preserves the mediocre.</p> <p>Bullet Point 9. If the intention is to severely restrict the possibility of any infill this policy should work well. However it is then difficult to see where ant development can take place in Charmouth.</p> <p><u>Policy H5 Housing Design</u></p> <p>Section 8.32. This section comments that ‘Charmouth has a wide variety of architectural styles and these contribute to Charmouth’s character’</p> <p>Section 8.34 refers to generic off the shelf design. This could be taken to include properties where major parts are built off site in clean efficient factories and assembled on site. E.g Huf Haus.</p> <p>The tenor of Policy H5, suggest by using words like ‘complementary’, ‘traditional’, ‘reflecting from pitches of roof’ ect. suggest that modern or contemporary architectural and design have no place in Charmouth.</p> <p>I object to Policy H5 unless it is clear that design can be modern and innovative as an alterative to ‘more of the same’.</p> <p><u>Policy GA2 Car Parking</u></p> <p>Bullet point 3. Section 9.22 suggest that 70% of households in Charmouth have one or no vehicles. It is difficult understand why this policy requires a minimum if two parking spaces. I would object on the basis that this inhibits the opportunities for affordable housing development.</p> <p><u>Policy CC1 Energy Efficiency</u></p> <p>Section 10.6. The Plan has nothing to say on the provision of electric car charging facilities in car parks or for existing properties which have no dedicated parking areas. This may deter visitors and provide a detrimental street scene if adhoc cabling is permitted without guidance.</p>
8	National Grid	<p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p>

9	National Trust	<p><u>Policy NE4 Local Green Spaces</u></p> <p>We have no objection to National Trust land indicated as LGS2, being included within the Charmouth Neighbourhood Plan. However, it is important to point out that National Trust does not own the full extent of the land that has been included under LGS2 (please see attached map with NT ownership indicated in green and proposed area of LGS2 in blue).</p> <p>it is also important to note that all of the land within NT ownership included within LGS2 is designated a Special Site of Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The presence of these designations gives legal protection from development under the Countryside Act and European Habitat Regulations. Whilst we do not restrict public access to the land in this location, due to the importance of the SSSI and SAC we would not want to encourage additional footfall in this area.</p>
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Rep ID	Respondent	Summary
10	Environment Agency	<p>We have identified environmental constraints within your plan area however as no growth is proposed, we have no site specific comments to make at this stage.</p> <p>Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better</p> <p>We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies and the South West River Basin Management Plan as appropriate.</p> <p><u>Policy CC2: Coastal Change and Flooding</u></p> <p>We note the significant weight the plan has given to the threat posed from sea level rise and coastal erosion. We support the aims of Policy CC2: Coastal Change and Flooding. Where areas of your Neighbourhood Plan area are given protection by a flood defence / alleviation scheme, the plan should identify the level of protection provided (including any climate change allowance) and what flood defences are required to protect existing properties. If it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the existing structures.</p>