



Dorset Council **Local Plan**



Community and Infrastructure

2021 Consultation
Summary of Responses

January 2023



Dorset
Council

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1. Community infrastructure

1.1. Introduction

Community Infrastructure

Primary Care Infrastructure CCG

- It is noted that the Local Plan recognises that a wide variety of community facilities and services will be needed to support development and GP practices are specified as one of the key areas.

Dorchester Churches Ecology Group

- We support the promotion of local life and infrastructure with community facilities in economic growth minimising the need to travel.
- Where possible, facilities should be located on public transport routes and should avoid generating significant additional car based trips by facilitating opportunities for active travel, including pedestrian and cycle routes.

Network Rail

- Loss of facilities in rural areas and villages due to economic changes and increased car ownership. Issues with the maintenance of such facilities if they cannot be self-funded (6.1.4). This is a key issue with regard to first mile last mile.
- It is relatively easy to secure one off capital grants to build or procure something whether it be a new bus, bike racks, village hall or library, but revenue funding to pay for ongoing staffing and running costs, plus repairs is much more vulnerable to funding issues.

Portland & Poole CPRE

- Co-ordination of some infrastructure issues needs urgent attention to produce a sound plan. Coordination maybe difficult since many organisations and separate funding sources are involved. Not just an illusory wish list.

Beaminster and Villages Local Area Partnership

- How will the infrastructure cope with the increased population from new housing at the same time as services are decreasing? Schools, doctors, employment, roads etc. will have to adjust to a changing population.

Town and Parish Councils

- Lack of infrastructure planning shown in this Draft plan means that there are likely to be fewer facilities e.g., doctors, dentists, medical centres, hospitals, Post Offices, banks etc. in larger villages or towns so journeys may need to be even longer than they are at present.

Public response

- Support for the aims and policies for the provision of a range of infrastructure, community facilities and services appropriate for the needs of the local population.
- Local infrastructure cannot cope with the large-scale developments.
- Infrastructure must be taken into account when considering any new proposed development.
- Need to invest in infrastructure to support new development.

- There is no mention in the "plan" on the effect of increased housing on local infrastructure - schools, health services, water and sewage services.
- The local plan does not demonstrate how it will encourage more people to make use of sustainable and active modes of travel in order to access work, leisure and services (the local plan should include commitments to support local bus services).

List of Community Infrastructure

Natural England

- Paragraph 6.1.2 - Given the recognised importance of green infrastructure to public health and wellbeing we recommend this is given greater prominence in the list. Also recommend the specific inclusion of allotments.
- Government is committed to phasing out new petrol cars by the end of the plan period. Petrol stations should be replaced by vehicle refuelling / recharging facilities in the list of local community buildings and structures.

Dorset Police

- Dorset Police supports the inclusion of 'Community safety and emergency services' within the definition of Community Infrastructure.

Dorset Climate Action Network

- Agree that social services should be protected and should expand in step with the growth of communities.

Green Martinstown Community Interest Company Transport and Energy Group

- The local plan does not mention the arts which provide work, attractions for visitors and encourage creativity and good mental health. Policies which support facilities are badly needed.

Town and Parish Councils

- Paragraph 6.1.2 - This is a helpful list identifying infrastructure facilities and services.

Figure 6.1 Strategic Priorities for community infrastructure

Dorset Climate Action Network

- Welcome the statement that the Council will deliver improved infrastructure across the whole of Dorset.
- Welcome the emphasis on the role of community facilities in contributing to quality of life, healthy communities, economic growth – particularly in terms of minimised need to travel and thus saving in use of energy and reduction of damaging emissions.

Town and Parish Councils

- We welcome the priority given to both preserving and actively fostering a sense of community.
- Home working in rural areas is traditionally high and may increase as it is enabled through technology - Plan should focus on the adequacy of the infrastructure to cope with the increase in home working.

Public response

- There are no references to development related to exploration or gathering of fossil fuels in Dorset Council area (the respondent also provides suggested wording for a strategic policy to support exploration and gathering of fossil fuels in the council area).

Infrastructure Delivery Plan

Primary Care Infrastructure CCG

- It is noted that the Infrastructure Delivery Plan to be developed will include a range of infrastructure projects required to support the implementation of the Local Plan.

Amphibian and Reptile Conservation

- Paragraph 6.1.5 could include a) sequence of events that are required for major settlements IDPs and b) timeline for delivery program to ensure that community infrastructure is delivered.

East Dorset Environment Partnership

- Paragraph 6.1.5 - would be helpful to identify the sequence of events required for each settlement/major development – in the past much needed infrastructure has not been realised for many years after developments have been completed.
- Mechanism will be required to secure appropriate sequencing of delivery on sites where there are multiple land owners and developer interests.

Dorset Climate Action Network

- Welcome the intention to produce an Infrastructure Delivery Plan (IDP) at the submission stage of the Local Plan.
- Policy should provide for transparency in the use of section 106 agreements and Community Infrastructure Levies.

Town and Parish Councils

- IDP is critical to the successful delivery of strategic goals – information should be available to support the consultation phase of this Draft Plan, prior to submission.

Developers/Landowners/Agents

- The prospect of a Dorset-wide CIL being implemented at the same time as the adoption of the DCLP makes it imperative that the Infrastructure Delivery Plan is prepared as soon as possible and not left to the last moment.
- Developers need to be able to understand the nature and scale of infrastructure provision that will be required to bring forward their sites, where these are allocated, and this should not be left until the policy wording of the Local Plan is already set.

Public response

- Green infrastructure (delivery and maintenance) must be embedded in the Infrastructure Delivery Plan to help unlock multiple benefits and make investment go further.
- The forthcoming Infrastructure Delivery Plan (IDP) should be subject to consultation.
- Dorset's infrastructure will place constraints on substantial developments.

2. Policy COM1: Making sure new development includes suitable provision for community infrastructure

2.1. Approach

Planning obligations and the Community Infrastructure Levy (CIL)

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Agreement with approach - importance of CIL cash flow for local councils/residents.

The Purbeck Energy Group

- The CIL and Section 106 payments are critical ways of providing what is needed in a community and it is essential that developers contribute in this way and are not able to get out of making those contributions.

East Dorset Environment Partnership

- Paragraph 6.2.8 - The first funding statement will be published by Dorset Council in December 2020 – should be updated.

Inspired Villages

- Support for the inclusion of this policy. It is agreed that community infrastructure should be provided as part of a development, creating attractive and vibrant places to live.

Town and Parish Councils

- Support the current approach as outlined in the current wording. Note that council intends to use both CIL and planning obligations to secure contributions.
- The community infrastructure levy MUST be levied.
- There needs to be more definition of the statement "When negotiated through section 106 agreement...".
- Contributions (specifically 25% of the total collected in any parish area) from CIL levies should be made to Parish Council's.

Developers/Landowners/Agents

- The Council's intention to introduce a plan area-wide Community Infrastructure Levy charging schedule is supported in principle.
- Accept that some sites will need to provide bespoke site-specific measures to mitigate their impacts.
- Welcome the clarity Section 6 offers, including in relation to CIL and s106.
- Greater clarification could be provided to enable increased understanding.

Public response

- CIL should apply to all developments.
- Agreement with approach - importance of CIL cash flow for local councils/residents.
- Need to justify larger allocations providing infrastructure through Section 106 and phase it out.
- On-site delivery should be required for all scales of development.
- Proposal for 10 or more dwellings should carry out assessment of required infrastructure jointly with the parish/town council.

- The policy is sound as far as it goes but there is no mention of the effect of the drip drip of small infill type developments that can often over time add greatly to the burden on local services.
- CIL is not sufficient to tackle the level of issues faced in Swanage.

Requirements and process

Dorset Climate Action Network

- Policy should include provision for monitoring the effectiveness of Section 106 agreements and Community Infrastructure Levies in terms of the agreed outcomes.

Town and Parish Councils

- Community Infrastructure should be discussed at the planning stage with parish and town councils. It has been the case in many instances where infrastructure has been agreed without local knowledge or need taken into account and it has been inappropriate development.
- There should be a requirement that any off-site delivery is approved by the local parish authority, to avoid a developer sponsoring a community scheme that is not a local priority.
- The policy should include provision for monitoring the effectiveness of CIL and S106 in terms of actual outcomes for community infrastructure.

Developers/Landowners/Agents

- A flexible approach is needed.
- Other tests set out in the CIL regulations must be met.
- Welcome the opportunity to discuss the appropriate mechanism (CIL or planning obligation) for securing infrastructure connected with proposed housing allocations.
- Whilst a need may be generated, the provision of the need as part of the development must also align with the infrastructure development plan and Community Infrastructure Levy.
- There needs to be a clear mechanism to avoid double counting and duplication through CIL, the infrastructure delivery plan and also site specific Section 106 agreements.
- It would be helpful if the policy, supporting text or evidence base quantified how or when development will generate a community need.

Public response

- Need details of how objectives will be achieved.
- Although this section identifies possible community infrastructure there is no specific policy on what should be provided in the allocations. There should be basic minimum standard policies in the plan for all proposed developments.
- It's a start but needs to go further on overall infrastructure requirement.
- Development, e.g., Vineries in Wimborne, being delivered without any infrastructure. Policy needs to be strengthened to ensure infrastructure and amenities provided.
- COM1, I. lacks precision.
- Concern that insufficient land has been set aside for community facilities etc and that substantial amounts of housing will be supplied without sufficient infrastructure.
- It seems that plans for building large scale developments are given the go ahead without regard to the effect they will have on the existing infrastructure, e.g. A35 already at capacity.
- The future provision of amenities and infrastructure is my biggest concern.
- More transparent reporting/auditing of planning obligations and CIL.

Distribution of funds

Historic England

- Historic England - Planning obligations, the Infrastructure Delivery plan and CIL should be used to conserve and enhance heritage assets as part of a positive strategy for the historic environment.

DAPTC

- Communities should be given more CIL monies rather than CIL being used for larger projects by Dorset Council.
- More engagement with local councils and a clear transparent strategy across the new unitary area on its adoption and use, moving away from s106 agreements.

South Western Railway

- The priorities for CIL investment need to be identified in the plan at this stage – this will help infrastructure and service providers plan ahead and secure additional funding sources to meet the full cost.

Town and Parish Councils

- Parish councils should have the opportunity to make bids to secure CIL funding from the council in order to deliver infrastructure in local communities. The proportion of CIL funds allocated for those communities with a neighbourhood plan is not sufficient to address the direct and wider impacts of development on local services and facilities, including schools and highways.
- The policy should provide satisfactory transparency in the use of CIL funding and should restrict the ability of developers from evading agreed community infrastructure responsibilities, and from altering agreed phasing of community infrastructure provision.
- CIL funds from larger schemes (e.g., Vearse Farm, Bridport) should be used in small villages to meet needs identified by the relevant Parish Council, where services have been drawn away from rural areas and into these larger conurbations by the attraction of larger developments.
- Asks for clarification on how CIL funds will distribute between the different functional areas.

Public response

- Agree with the principle in this policy but have concerns about the equitable distribution of the Community Infrastructure Levy funds.
- All development contributions should be through CIL to give the parish/town it's share.
- Any financial contributions must be ring fenced for the community where development has taken place.

Viability and exemptions

Dorset County Hospital

- Support the intent of the policy. Does not seem appropriate that public sector bodies should be charged planning obligations for their own development as this will be taking money away from front line services - part iii should clarify that contributions will not be sought from community or public service providers where development supports the delivery of services.

Bridport Area Neighbourhood Plan Group

- Self-build CIL exemptions can result in a loss of potential CIL income and requires close subsequent monitoring to confirm residency requirements are met - query whether there is a better way?

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Self-build CIL exemptions can result in a loss of potential CIL income and requires close subsequent monitoring to confirm residency requirements are met - query whether there is a better way?

Inspired Villages

- Support for flexibility in the policy based on lower need, for example education contributions from care homes.
- It is recommended that this list within the Policy is extended to include Extra Care facilities that fall within the C2 Use Class. Class C2 use is more self-sufficient and places less pressure on community facilities and therefore should not be expected to provide the same level of contribution towards community facilities as C3 development.

Dorset Climate Action Network

- Need to restrict the ability of developers to evade agreed responsibilities for the provision of community infrastructure aimed at net-zero accessibility, or from altering the agreed phasing.
- Policy should require developers to produce a viability assessment for the provision and maintenance of community infrastructure over the lifecycle of a development.

West Dorset Western Area Transport Action Group (WATAG)

- The policy should require developers to produce a viability assessment for the provision and maintenance of infrastructure for net-zero accessibility over the lifecycle of a development. The policy should include provision for monitoring the effectiveness of CIL and S106 in terms of the agreed outcomes.

Town and Parish Councils

- Notes that self-build exemption to CIL as a loss of income of the Parish Council.
- Does not accept that economic viability should be used as an excuse to avoid paying for essential community infrastructure.
- If a development cannot deliver essential community obligations, it should not be approved.
- Concern that the viability test presents an open opportunity for developers to deliver housing on which they can profit but which makes no contribution to the needs of a community.
- The policy should require developers to produce a viability assessment for community infrastructure provision.
- Over recent years the viability of schemes has taken precedence over community infrastructure, even though communities need this type of investment.
- Queries whether self-build plots on allocations will be subject to requirements relating to a planning obligation and CIL. The existing process for self build CIL exemptions appears to be successful and monitored well.

Developers/Landowners/Agents

- Viability must be taken into account.
- Infrastructure should be sought only where viable.

Public response

- Thread running through the plan is a soft approach to developer commitments - requirements on developers should be mandatory and not optional.
- 106 agreements must always place an obligation on developers, they should never be qualified with the term “if viable.”
- It's too easy for developers to argue to not deliver infrastructure originally agreed at planning permission stage.
- Policies on Community infrastructure and Community provision must be watertight so that developers can be held to their obligations, currently too much wriggle room.
- The plan says it will provide community infrastructure but provides too many ways developers can avoid meeting commitments. Measures are needed to prevent this.
- No guarantee that infrastructure expectations will/can be met.
- Criteria (i) - Planning needs must be more readily and robustly defended against claims of non-viability.
- Revise drafting of policy to introduce greater flexibility around viability.
- Support approach to making sure development delivers new infrastructure.
- Priorities need bolstering with strong policies that will be enforced despite pleas from developers to circumvent them - such as claims of non-viability or that a proposal is only just outside a defined development boundary.

Phasing/Timing

Town and Parish Councils

- Sites promoted need to be supported by sound infrastructure requirements, so they are developed according to the plans and not just huge areas of housing. Infrastructure supporting new developments should be built before the houses, to prevent developers slipping out of their contract, as has already happened at Chickerell.

Developers/Landowners/Agents

- Phasing of payments/delivery should be considered.
- Phasing of community infrastructure should be determined on a case by case basis, so it can fully relate to the viability and delivery requirements of each individual proposal - may not be viable to deliver community infrastructure in advance, or in parallel to development, for reasons beyond the developers control.

Public response

- Proposed new homes which haven't yet been granted planning consent should be put on hold until all the considerations raised have been sorted out. These important matters need to be addressed before the plan is adopted.
- Will infrastructure keep pace with housing.
- Policy should be strengthened and more detailed with timings, requirements, and penalties.
- Infrastructure must be improved to cope with any development before or at the time of that development.
- Service and infrastructure should be delivered in a timely manner.

Transport and roads

The Dorset and Bournemouth, Christchurch & Poole Local Access Forum

- Based on experience with CIL charging schedules developed by DC predecessor bodies recommend that expenditure needs assessment process take proper account of the role which improved paths/bridleways/cycleways can play in improving quality of life for the neighbouring communities.
- Given need to promote public access to the countryside without generating additional car traffic would be appropriate to look to CIL income to support improved rural bus services.

Go South Coast Buses

- Support the policy subject to amendments. Note the need for site specific contributions outside of CIL however bus services need to be provided at the right moment to make best use of funds. Suggest specific amendment to include requirement on appropriate phasing.

Bournemouth Transport Ltd trading as Yellow Buses

- Where possible developers deal directly with the bus operator to fulfil the planning requirements of the local authority.
- Through section 106 agreements in terms of revenue funding, or CIL as capital funding for the purchase of vehicles.

The Purbeck Energy Group

- Planning applications for all significant new developments should be accompanied by a coherent transport plan, in that these developments shall be truly 'sustainable'.
- The issue of transport accessibility should not be treated as a separate exercise.
- The Local Plan must take into account the energy required for electric vehicles. Renewable energy should be generated locally to meet this need.

Town and Parish Councils

- Local utilities and roads should be improved to take the proposed new development. At the moment it appears new buildings are latched onto existing utilities and roads without consideration of future consequences.
- Local roads on the Isle of Purbeck are heavily congested (particularly during holiday seasons). Consider that further development should not be permitted in this area unless supported with appropriate infrastructure. Policy should make explicit reference to roads.

Public response

- The Plan needs an integrated transport plan to link all Dorset communities, avoid unnecessary private car journeys, promote public transport and encourage walking and cycling.
- Local plan should include a policy which prioritises and encourages sustainable development (which reduces the need to travel), active travel, public/shared modes of travel followed by vehicles which use sustainable fuels in this order.
- Need to reduce automobile use rather than avoid significant additional trips, at present the opposite is happening to locating development on public transport routes.
- Where definition of community infrastructure includes 'roads, rail, port facilities and bus services' this should be expanded to include 'airports and associated infrastructure for navigation and safety' as development will need to fund any necessary changes/upgrades resulting from development.
- The plans need to increase parking as public transport is unavailable.

- Need good cycle lanes and more infrastructure.
- Provision for community infrastructure should include sustainable transport.
- Policy needs overall strengthening and must include a commitment to the provision of public transport and other non-car transport solutions.
- The local plan must take into account the energy needed for electric vehicles.
- The local plan should include policies to cut/reduce traffic related pollution (including CO₂, noxious gas and particulates).
- Local plan should include policies/strategy which support delivery, and improvement to, public bus services in rural area.
- Local plan policy should include a requirement for all new significant developments to be accompanied by a transport plan.
- Local plan must take account of energy required for electric vehicles.

Health and Education

Primary Care Infrastructure CCG

- Acknowledge the need for additional housing but would emphasise the essential investment required in the primary care infrastructure to enable GP Practices to deliver quality primary care services to their local community.
- There is a need for estates support in relation to the additional housing proposed. More services are being delivered in the community to support patients closer to home, and with many practices already at capacity, it will become more challenging to maintain the delivery of quality patient services. We also need to ensure that practices are located in the right place within communities to support easy access.
- The new approach agreed by Dorset Council in November 2020 in relation to securing developer contributions for NHS related infrastructure was welcomed. However, we would also appreciate the opportunity to seek discussions with future developers in relation to land and site options as they arise.
- Areas of particular concern are: Bridport, Dorchester, Ferndown, Gillingham, Sherborne, Wimborne. Does not infer infrastructure is not required in other areas. Projects such as addressing the need in Chickerell, are already under review.
- It is understood that any future planning applications submitted to extend current practices will follow due process. Request that the effect of increased housing on local GP Practices is acknowledged within the application process.

NHS Property Services

- Health facilities should be provided alongside housing - the council should work with the NHS to consider the quantum and location of healthcare development to ensure new settlements are sustainable. Section S106/CIL funding required towards healthcare services - need to undertake early assessments to see what is required. Support for including healthcare infrastructure as part of COM1.

West Hampshire CCG

- The Council must ensure suitable healthcare contributions from developers are secured under Section 106 agreements towards the costs of developing the Health infrastructure.
- Where housing developments in South Eastern Dorset result in local residents accessing healthcare services commissioned in Hampshire, the Council should work in consultation with

West Hampshire CCG to agree appropriate developer contributions related to Health infrastructure to be sought via Section 106 agreements.

- Support in principle for the adoption by the Council of a Community Infrastructure Levy (CIL) with a strong proviso that the Council accords a high priority when allocating funds raised by the CIL to the development of Health infrastructure during the period of the Local Plan.

BCP

- The plan recognises the need to plan for the needs of education infrastructure particularly in locations that provide for new homes and that development contributes to the costs of such provision, and/or allocates land as part of development to accommodate new school provision. Where there is significant development close to the BCP/Dorset boundary there will be a need for our Local Authorities to continue working together to consider how to address the need for, and funding of, additional school places across all age groups and particular needs.

The Grove Medical Centre

- There is no specific mention of provision of health services. At present nearly all areas in the Dorset Council area have primary care located in buildings not fit for purpose or the volumes of patients that will be wanting our services. Both GP practices in Sherborne are currently at capacity in terms of room utilisation for patients. If we were able to access funds to support any development of either our current premises to add capacity or potentially a new site in the west of the town at the point of planning, without it additional patients numbers will put extreme pressure on services.

Beaminster and Villages Local Area Partnership

- There appears to be a lack of consultation with health at the council.

Thomas Hardye School

- Thomas Hardye School needs to commit substantial investment to upgrade the current theatre and also create covered courts for tennis and netball. Supportive of the allocation of surplus land as enabling development. Theatre project already secured s106 funding.

Environmental groups (non-statutory)

- In practice facilities (including health centres) not being delivered with new homes.

Town and Parish Councils

- Developers must be required to work in partnership with the local service providers; NHS (doctors, dentists), School provision.
- Capacity issues at doctors surgeries.
- Demographics of local area must be considered with new developments to ensure that every section of the community has sufficient and adequate community infrastructure provision.
- Consider that the policy should make explicit reference to schools and surgeries.

Public response

- The Plan makes no mention of increased medical facilities as part of its infrastructure, and it appears to just concentrate on an increase in housing without taking into consideration the needs of those who will occupy those dwellings. More forward thinking is required before it becomes an insoluble problem.
- The policy needs to explicitly make sure that there are sufficient doctors' surgeries in proportion to the increased housing in Sherborne.

- The policy simply cannot deliver the required infrastructure. Dorchester Hospital will not be able to cope with the increase in population that will result from this development without significant expansion.
- The available GP services and health care provision is already inadequate, further homes will require extra provision, not just in a retirement village, but for the town and rural population.
- Although mentioned in the list of community infrastructure there is a lack of reference to how the expanding population will be served by enhancements of local health services and schools.
- Developments should be integrated with sufficient infrastructure provision, such as schools and medical services so that needs can be met locally.

Other Infrastructure

Dorset Police

- The significant housing growth proposed across the district will require additional investment in many of the buildings across the estate. Infrastructure encompasses a broad range of capital expenses and is not limited to buildings and could include equipment such as vehicles, communications technology, and surveillance infrastructure such as CCTV.
- Any increase in development is likely to result in additional crime, anti-social behaviour incidents and public safety/welfare incidents which will translate into day-to-day impacts upon Dorset Police. To address this impact it is critical to ensure that existing infrastructure has sufficient capacity to accommodate new development and where it does not to ensure this can be delivered using the S106 or CIL mechanisms.
- There is support for provision of policing infrastructure in numerous appeal decisions and it is reasonable for the police to seek infrastructure contributions from development proposals to mitigate the negative impacts they cause.

Beaminster and Villages Local Area Partnership

- Local amenities are not thought about when deciding new planning applications.

Town and Parish Councils

- New development should be accompanied by suitable infrastructure.
- Consideration will need to be given for improvements to the existing sewerage system, broadband services and mobile phone networks. A considerable amount of CIL/S106 money will come with this size of development and it is important that it is used in the best locations and with suitable and adequate infrastructure introduced. The need for affordable housing and starter homes is vitally important.

Public response

- Include new tree planting as part of community infrastructure - making room or nature within the planning agreement.
- Improved provision for allotments so that residents can grow vegetables/fruit as many gardens are too small to meet this increasing demand. Green spaces and hedge/tree planting should be advised by Dorset Wildlife Trust, Butterfly Conservation, RSPB and the Woodland Trust.
- Need more emphasis on providing/improving wider recycling schemes.
- No mention of strategic infrastructure, e.g., arts venues, high grade sports venues.
- Provision of facilities including Educational Provision, Recreational Facilities such as Sports Pitches, Skate Park, Tennis Courts.

- Biodiversity could be considered as infrastructure. Community Infrastructure Levy (CIL) payments which mitigate the impact of development could be directed towards restoring biodiversity.
- Further provision needs to be made for delivery infrastructure in the new local plan - in particular for the elderly.
- Significant investment is needed in NHS services and facilities to accommodate demand from proposed housing development.
- A proportion (10% of the assessed need or around 3,000) of the new affordable homes should be allocated for health care workers.

Other Issues

Environment Agency

- Some new development may be near existing waste management activities and the potential for associated amenity issues. These issues should be identified and addressed prior to planning being granted.

Town and Parish Councils

- Community Infrastructure seems to be limited only to Tiers 1-3 – there is no mention of tier 4 rural areas.
- Community infrastructure has been lost in rural areas and the local plan policy should include a requirement to support delivery of new community infrastructure in rural areas.
- The local plan should mention community energy schemes given the climate emergency.

Public response

- Not ambitious around the council's aims with regard to the climate and ecological emergency - not specific enough.
- Plan acknowledges key services within Dorset that have been lost but COM1 reinforces business as usual and does nothing to tackle this.
- Ensure that any area has the agreement of the existing residents and meet their needs with the increasing population.
- Infrastructure expectations not discussed with community.
- If community requested provision should make it policy.
- Need more buses, increase to learning and training opportunities for young people, and to enable key workers patients and other visitors to attend hospitals and doctors easily.
- Need to combat isolation and enable residents in the local villages to visit friends and go shopping and participate in community life.

Paragraph 6.29 - Sites proposed to be excluded from CIL

Symondsbury Parish Council

- Whilst noting the presence of a planning obligation the parish council considers that subsequent phases of the Verse Farm development (for 160 homes) should be subject to CIL.

Sherborne Castle Estate

- Welcome the opportunity to discuss the appropriate mechanism (CIL or planning obligation) for securing infrastructure connected with proposed housing allocations at Sherborne (these discussions should be framed in the context of viability work for the local plan).

Pegasus Group on behalf of Persimmon

- Support for exclusion of CHIC1 strategic allocation from CIL.

Persimmon

- The proposed continued exclusion of the Chickerell strategic site (CHIC 1) from the CIL Charging Schedule is supported.

3. Policy COM2: New or improved local community buildings and structures

3.1. Approach

Principals relating to new local community buildings and structures

Town and Parish Councils

- Chideock Parish Council suggests that the council must address the conflict between restrictive planning requirements elsewhere in the local plan and the policy relating to new, replacement and improved community buildings and structures.
- Symondsburry Parish Council support the current approach (which builds upon / reflects that in Policy CF22 of the Bridport Area Neighbourhood Plan) and policy drafting.
- Bridport Area Neighbourhood Plan Joint Councils Committee (JCC) supports the policy approach (which enhances Bridport Area Neighbourhood Plan policy CF2) and agrees with the flexibility of wording for innovative and modern designs and use.

Developers/Landowners/Agents

- Respondents suggest that policy could be broadened to provide support for such facilities where the need or aspiration is identified in a neighbourhood plan.

Public response

- Respondent notes that the local plan should include policies/strategies to support delivery of the development listed as 'Local Community Buildings and Structures'.
- Respondent suggests broadening the scope of the policy so that it would support delivery of facilities that a neighbourhood plan indicates are needed or identifies as an aspiration.

List of community buildings and structures

Natural England

- As the Government is committed to phasing out new petrol cars by the end of the plan period, Natural England recommends that the council takes out references to petrol filling stations and replaces this with reference to vehicle refuelling / recharging facilities.

Town and Parish Councils

- Chideock Parish Council is concerned that there is no mention of public toilets in the community facilities list and stresses the importance of retaining and maintaining public toilets.
- Symondsburry Parish Council considers that the list of community buildings and structures in the local plan should also reference future technologies that communities will require (for example

vehicle charging stations and on street vehicle charging) to provide flexibility and support innovation.

Developers/Landowners/Agents

- Hall and Woodhouse notes that the list of local community buildings and structures includes cafes, restaurants and public houses and the following text ‘especially where there are only one or two left’. It considers that this text should be deleted as it is ambiguous, and suggests that:
 - each case should be considered on its individual merits; or
 - the text should be reworded to say ‘especially where the removal would leave the local community without such a facility within the locality’.

Public response

- Respondents suggest that petrol stations should be added to the list so council can help find a new use for them following bans on sales of diesel and petrol cars.

Paragraph 6.3.3 - Public transport routes

Environmental groups (non-statutory)

- Respondent agrees that new local community buildings and structures should be located on public-transport routes but suggests that public-transport needs to be provided over the lifecycle of any development.

West Dorset Western Area Transport Action Group (WATAG)

- Paragraph 6.3.3 agree that development should be located on public-transport routes, but the Local Plan, in conjunction with a Transport Strategy, must ensure that such transport is provided over the lifecycle of any development.

Town and Parish Councils

- Bridport Town Council considers that the policy will not succeed unless public transport provision is enhanced and that a transport strategy is needed to support this aim (the policy would flow from the strategy).

Public response

- Respondent agrees that community buildings and structures should be located on public transport routes, but states that the plan, in conjunction with a proactive transport strategy should work harder to ensure that these routes provide sufficient public transport to offer a viable alternative to the car.
- Respondent considers that there should be a coherent transport plan supporting all new community buildings and structures (transport infrastructure should be considered as an underlying consideration in all policies).

Paragraph 6.3.4 - Rural settlements

Environmental groups (non-statutory)

- Respondent considers that local community buildings and structures are crucial infrastructure which contribute to service provision in villages.

Public response

- Respondent suggests that the policy should support the delivery of a community shop in each village and volunteer bus services for villages.

Paragraph 6.3.5 - Natural Environment

Environmental groups (non-statutory)

- Respondent suggests that paragraph 6.3.5 should be revised to cross reference Policies ENV2, ENV3 and ENV4.

Paragraph 6.3.8 - Existing facilities

Town and Parish Councils

- Dorchester Town Council considers that new community buildings and structures should be designed to complement existing buildings including community-based facilities.

Heath Care and Education

The Grove Medical Centre

- Need to prioritise amenities delivered according to a review of local need.

Town and Parish Councils

- Maiden Newtown Parish Council considers Policy COM2 should cross reference planned education facilities (as identified by the council's education department), stipulate that these facilities should be located to reduce the distances needed to travel to schools, and that the policy should identify those instances where it is has not been possible to expand an existing facility.

Public response

- Respondent considers that adequate health care and school facilities are 'a fundamental need for any thriving community' irrespective of whether they are located within or around existing settlements.
- Respondent suggests that the policy should cross reference growth in populations and the provision of medical services.
- Respondent suggests that the policy should specifically support and identify necessary infrastructure for local health services and social care, and notes that 'Quarter Jack Surgery' in Wimborne needs to be enlarged to provide accommodation for health professionals.

Climate Change

Environmental groups (non-statutory)

- Respondent considers that the policy will not succeed unless there is a 'net-zero accessibility for all' is incorporated as a key objective (the respondent considers that this would need to be supported by a bold transport strategy).

Public response

- Respondent considers that there is a need to integrate 'zero-green house gas accessibility' to make policy COM2 succeed, that 'zero-carbon transport solutions' should be designed for the lifetime of development and that as drafted the policy fails to acknowledge the severity of the climate change emergency.

Waste Management

Environment Agency

- Environment Agency notes that community buildings or structures may be located close to existing waste management activities, creating potential amenity issues for the proposed development. These issues should be identified and addressed prior to planning permission being granted.

Green Belt

Public response

- Respondent notes that the policy will not by itself support delivery of community buildings and structures in the Green Belt around existing settlements, and that it might not be practicable to deliver development within settlements inset within the Green Belt. Respondent considers that this could encourage unsustainable travel.

3.2. Policy

Criterion I – ‘Accessible sites’

Town and Parish Councils

- Dorchester Town Council considers that ‘accessible’ should always mean within the development, not on the edge or beyond its boundaries.

Public response

- Respondent supports the drafting of the policy in respect to the location of new development and suggests that the council should avoid out of town facilities.
- Respondent notes that new facilities are expensive to provide and considers that they should therefore be located in the most sustainable locations (where they can be easily accessed) and be of high-quality design (as part of this they should make use of sustainable means of construction and be energy efficient).

Criterion II – ‘Significant additional trips’

Environmental groups (non-statutory)

- Respondent considers that criteria in the policy should support reductions in the use of private vehicles, rather than to avoid ‘significant additional’ single purpose trips by private car.

Town and Parish Councils

- Bridport Town Council considers that the aim should be to reduce car use, rather than to avoid “significant additional” trips by car.

Public response

- Respondent considers that due to the severity of the climate change emergency, the policy aim should be to reduce automobile use rather than to avoid ‘significant additional’ trips.

Criterion II – ‘Ecological network’

Environmental groups (non-statutory)

- Respondent suggests that the following text should be added to the criteria presented in II. of the Policy COM2: ‘new community buildings must not be built on current or potential ecological networks’.

Additional criterion

Swanage Railway

- Respondent suggests revision to the requirements of Policy COM2 which allow new or improved local community buildings and structures where: the use cannot reasonably be met within a settlement; and the facility:
 - meets an identified local need;
 - is located close to a settlement, or in an accessible location; and
 - its impact on landscape, environment and local character is minimised.

Town and Parish Councils

- Bridport Town Council welcomes the support which the policy would confer for Bridport Leisure Centre.
- Bridport Town Council considers that Policy COM2 should:
 - support delivery of more community spaces that are needed in Bridport town centre for youth, families, and the elderly.
 - encourage use of vacant shops for community use.
 - support delivery of health and social care facilities, as these are not adequately catered for in current planning policy.

4. Policy COM3: Retention of local community buildings and structures

4.1. Approach

Principals relating to the retention of existing local community buildings and structures

Town and Parish Councils

- Portland Town Council notes that Portland has lost the Royal Manor Youth Club. The town council considers that youth services are desperately needed in Underhill and the youth resource must be retained. The town council considers that there should be further ‘youth provision’ in other areas of the island which should be included in the plan.
- Weymouth Town Council supports the protection and provision of community facilities.
- West Moors Parish Council considers that the plan needs to show vision for the versatility of the modern library. It is not just for reading books, and notes that the variety of services it provides is priceless.
- Symondsburry Parish Council support the current approach as outlined in the current wording.

- Dorchester Town Council considers that plan document should be refocused on development that sustains and creates vibrancy in smaller settlements, such that these facilities are not lost, which in turn results in extended journeys to access such facilities elsewhere.

Dorset County Hospital Foundation Trust

- Dorset County Hospital Foundation Trust objects to this policy as currently drafted as it would not facilitate the best outcome for patient care and experience.

NHS Property Services

- Having regard to national policy (paragraphs 92. c) and 93. b) of the National Planning Policy Framework), NHS Property Services considers that if health centres and other medical facilities are defined as community facilities local plan policy should allow for the loss of these facilities within the context of estate regeneration.
- NHS Property Services is concerned that restrictive policies relating to community facilities could prevent or delay required investment in alternative facilities and work against the aim of providing essential healthcare services for the community.
- NHS Property Services considers Policy COM3 is overly restrictive and would not provide a sufficiently flexible and positive policy basis for the delivery of NHS facilities.
- NHS Property Services notes that there are separate, rigorous testing and approval processes employed by the NHS to ensure the right facilities are in the right place at the right time. NHS Property Services considers that where NHS commissioners can demonstrate that healthcare facilities are no longer required it should be accepted that such sites are suitable for housing, or other viable uses.

Environmental groups (non-statutory)

- Beaminster Area ECO group supports the continuation, and strengthening, of services in rural settlements (COM3).
- Beaminster Area ECO group considers that additional housing alone will not sustain the vitality of a town or village, and that people of working age will only come to a place or stay if they have access to services and to jobs.
- Beaminster Area ECO group have been encouraged in recent years by the saving or creation of facilities such as the Community Shops at Thorncombe and Broadwindsor, the Multi-use games area at Broadwindsor and the revitalised playground at Beaminster. All of these services were funded by the Southern Dorset Local Action Group but note that funding will be required going forward.
- Dorset Climate Action Network is keen to see continuation and where possible strengthening of services in rural settlements.
- Dorset Climate Action Network emphasises the need to secure balance and mutual support between the main physical elements in our communities to achieve quality of life and to enable people to find that life without having to travel far from home.
- Green Martinstown Community Interest Company Transport and Energy Group welcome the objectives, but query how these will be met? And consider that mechanisms are required to ensure developers provide facilities in their proposals.

Community groups (non-statutory)

- Bridport Local Area Partnership suggest that the text accompanying this policy should clarify the process for assessing proposals involving a loss of an existing local community building.

Public response

- Respondent suggests that where village pubs have already been lost, maybe communities could provide facilities in village halls, barns etc.
- Respondent objects to the retention of business that have been clearly well advertised and cannot be let or sold in open market or to community.
- Respondent considers that this policy does not offer sufficient protection for public houses, which should by default be recognised as assets of community value.
- Respondent considers that this policy is inconsistent with the proposal to build on Sturminster Marshall golf course.
- Respondent suggests that buildings and sites should be used as craft centres to support local crafts people/artists.

Paragraph 6.3.9 - Heritage assets

Historic England

- Historic England supports the acknowledgement in paragraph 6.3.9 of the local plan's supporting text which states that local community facilities and structures can also be heritage assets.
- Historic England supports the intent of Policy COM3, and in those instances where the community building or structure is also a heritage assets states that the use of these facilities can also make an important positive contribution to an asset's overall significance.
- Historic England encourages revisions to the supporting text for Policy COM3 to address the issue of considering the impacts on the significance of local community buildings and structures that are also heritage assets (it suggests cross referencing Policy ENV5).

Paragraph 6.3.16 - Marketing and Viability

Developers/Landowners/Agents

- Hall and Woodhouse suggest that the requirements for the retention of local community buildings and structures in Policy COM3 should not apply in settlements where there are more than one community building or structure.
- Hall and Woodhouse suggest that the text in paragraph 6.3.16 should be revised to include a specific period for marketing of no more than one year unless a shorter period is agreed with the council.
- Hall and Woodhouse states that the drafting of Policy COM3 should clarify that the evidence from a marketing campaign should be accepted as demonstrating:
 - that there is no longer a need for the facility; or
 - it is no longer practical to continue the existing use/is no longer viable.

Environmental groups (non-statutory)

- East Dorset Environmental Partnership suggests that it may be appropriate to apply some sort of timeframe for decisions so that any change of use or loss is not rushed unnecessarily.

Public response

- Respondent considers that applicants seeking a change of use shouldn't have to pay for viability study (para 6.3.16) if there is clear evidence that the business has struggled despite best efforts and thorough marketing. In these instances, the council should pay for viability report (if one is needed).
- Respondent considers that the policy needs more rigorous assessment of viability of business to make sure it really is no longer viable.

- Respondent suggests that the policy text is re-drafted as follows: ‘Community buildings in Tier 3 or Tier 4 should be able to support change of use including residential after 18 months marketing if loss making.’ Respondent does not consider that there should be a requirement to prepare a viability report.

Retention of public houses

Public response

- Respondent does not consider that it is possible to have two viable pubs in settlements ranked as tier 2 or 3 and that there needs to be a quick and simple method to allow change of use.
- Respondent considers that if there is 5-year land supply shortage then change of use to housing for second pubs in tier 3 and 4 villages should be automatic.

Retention of rural post offices and village halls

Public response

- Respondent considers that the policy should be strengthened to be more specific about the retention of rural post offices and village halls.

4.2. Policy

Criterion I

Dorset County Hospital Foundation Trust

- Dorset County Hospital Foundation Trust suggests that Policy COM3 is amended in the following ways: The first part of the policy should support re-development of those buildings that are no longer needed due to a service change, reorganisation or re-location, and states that the change of use may need to be considered before an existing use ceases in order to provide certainty and financially support the relocation/service change.

NHS Property Services

- NHS Property Services suggests that drafting of Policy COM3 is revised (to avoid inadvertently imposing further evidential requirements or marketing periods on the NHS beyond its own internal processes) as follows:
 - ‘the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services. In the case of proposals where the loss of the use would form part of a wider public estate rationalisation program, evidence of such a program would be sufficient as a form of evidence that the site is surplus to requirements and as such would not be required to submit marketing information.’
- NHS Property Services considers that the proposed revision would ensure that COM 3 is justified, effective and consistent with national policy.

Criterion II

Dorset County Hospital Foundation Trust

- The second part of the policy should not include a requirement to consider continuation or diversification of existing community use as this may not deliver best value for money or service

change. These value for money tests are requirements which have to be met by other regulations on public bodies.

Environmental groups (non-statutory)

- East Dorset Environmental Partnership supports the drafting of part two of the policy which encourages diversification of an existing community building or structure in response to changing circumstances (for example as with Covid-19).

5. Policy COM4: Recreation, sports facilities, formal open space, and play

5.1. Approach

Overall Approach

Town and Parish Councils

- Support for the approach.
- A wider strategy is needed to support this policy so that future protection and coordinated development of facilities can be assured.
- Should be a requirement that any delivery is approved by the local parish authority, to avoid a developer providing unsuitable facilities that suit the development of the land holding but are not a local priority.
- Suggestion that recreation activities should start from home and be accessible by a 12 year old travelling alone.

The Grove Medical Centre

- Wording does not consider piecemeal development so could get out of providing facilities.
- The approach does not look at development of town/community as a whole where community might need larger scale facility but due to nature of development only end up with small scale facilities.

Local community groups (non-statutory)

- Concern with the lack of proposals on how to achieve the aims.

Developers/Landowners/Agents

- Support for the policy.
- Support for the value attributed by section 6.4 of the consultation document towards recreation, sports facilities, formal open space and play.
- Such facilities are vital for peoples' wellbeing.

Public response

- Guidance on sport, recreation and play facilities is comprehensively covered.
- The LP fails to make any reference to the importance of consulting Sport England in the provision these facilities.
- Note the need to protect local green infrastructure.

Allotments

Natural England

- Paragraph 6.4.1. and Policy COM4 – recommendation that allotments are added to the list of community open spaces, and referenced in the policy.

Town and Parish Councils

- It is disappointing that in light of the Climate Emergency, no reference is made of the importance of the provision of allotment sites.
- Allotments enable residents to grow their own food, minimise their carbon footprint and minimise the amount of packaging used for food, as well as providing health and wellbeing benefits.

Public response

- The approach should include allotments.

Open Space

The Grove Medical Centre

- Suggestion that open space and amenities are vital for public health and support for development of further space.

Local community groups (non-statutory)

- The policy would benefit from and be clarified by the addition of an accompanying table. For example, a helpful list of the various types of open spaces it supports.

Public response

- Suggestion to include the policy within general Open Space policy.
- Absence of reference to Green Space provision or any standards for this.

Rights of way network

British Horse Society

- Suggestion to have joined up rights of way network for use by all vulnerable non-motorised users including walkers, cyclists and equestrians - greater need to do so as road network becomes increasingly busier.
- Suggestion to use new developments to work towards the goal and new public rights of way and update rights of way and footpaths.
- Suggestions for use of inclusive terminology including 'multi-user path' or 'greenway'.
- Request for consideration of vulnerable non-motorised users.

Town and Parish Councils

- Cycle routes should be mentioned for access.
- Support for work of North Dorset Trailway Trust and appreciates importance of Trailway as recreational facility – benefits in terms of sustainability criteria, economic benefits to local businesses, increased tourism, access to wider rights of way network.

Environment

Developers/Landowners/Agents

- The role of on-site SANG in meeting or off-setting open space typologies needs to be explored, but we would suggest that this is best done on a site by site basis.

Public response

- The Climate and Ecological Emergency planning should inform this section.
- Access to natural and biodiverse greenspace such as woodland, meadow, heath should be considered a requirement for community infrastructure in the same way as “formal open space”.
- The importance of natural greenspace and trees to the wellbeing, physical and mental health of children and whole communities and this cannot be substituted by formal play areas such as playgrounds.
- The learning about, enjoyment of and connection to nature that easy access to natural greenspace enables, is essential to creating the nature stewards of the future, necessary to the restoration and security of Dorset’s countryside and wildlife.

Paragraph 6.4.2 - Funding and management

Town and Parish Councils

- Paragraph 6.4.2 - Query what is proposed in terms of contribution funds to the councils when the development is only subject to a section 106.
- Queries whether there is an opportunity for local communities to bid to secure CIL funds for local infrastructure projects.

Sport England

- Need to secure contributions for maintenance say not less than 20 years.

Local community groups (non-statutory)

- Pleased to see reference to the Town and Parish Councils portion of CIL being retained.
- Where Dorset Council holds surplus CIL levies, input from the “functional” area where the development took place should be sought.

Public response

- Market towns run pitches with minimal financial contributions from surrounding area, it is hoped that Dorset Council could develop a different policy.
- Many authorities run sports pitches but in North Dorset all are looked after by town and parish councils.
- Biodiversity could be considered part of the infrastructure, so Community Infrastructure Levy (CIL) payments which mitigate the impact of development could be directed towards restoring biodiversity.
- Requirement for funding of school halls, gyms, church halls, swimming centres, outdoor fitness equipment, dog facilities.

Paragraph 6.4.3 - Assessment of need

Public response

- There is no assessment of what recreational facilities may be required at present or projections of future need and location.

Paragraph 6.4.4 - Dorset Playing Pitch Strategy

Sport England

- The policy should reference the Dorset Playing Pitch Strategy.

Paragraph 6.4.5 - Indoor facilities

Developers/Landowners/Agents

- It is important to recognise that paragraph 6.4.5 specifically refers to indoor facilities and not outdoor pitches.

Paragraph 6.4.6 - Fields in trust

Town and Parish Councils

- Support for the references to Fields in Trust standards.
- The policy should include reference to natural green space provision FIT standards.

Local community groups (non-statutory)

- Support for reference to Fields in Trust standard.

Paragraph 6.4.7 - adjusted to take account of facilities in the local area

Developers/Landowners/Agents

- Supports for thresholds for various facilities in figures 6.2 – 6.4 relating to recreation, sports facilities and open space provision are benchmark standards that can be adjusted to take account of facilities in the local area.

Public response

- Support the need for guidelines relating to open space - the standards in Figure 6.2 should be adjusted to take account of existing facilities in the local area.
- Welcomes the flexibility of benchmark standards that take account of facilities.
- The Sport and Recreation Report in the evidence list suggests that facilities are dated. The plan provides no indication about how this issue will be addressed.

Paragraph 6.4.7 - Maximum / Minimum provision

Public response

- Policy should exceed target provision - should be a bare minimum.

Standards of provision

Developers/Landowners/Agents

- Detailed guidance on standards for recreation, sports facilities and open space are welcomed.

Public response

- Nothing in the tables listed that would encourage middle aged persons with sedentary jobs or older population to exercise - these need it most.

Figure 6.1

Public response

- Queries whether figure 6.1 is missing or if they are misnumbered?

Figure 6.2: Guidance on standards of play / games area provision

Sport England

- The figure 6.2 standards are not acceptable, should be using strategy instead - playing pitches and outdoor sports should be removed from this table.

Town and Parish Councils

- Figure 6.2 - “scale of development” is a broad brush and would affect different size of existing towns/villages/hamlets in different ways.
- Concern that most big developments may only have to possibly “contribute” to a multi-use Games Area - under ambitious and too lenient on developers.
- A 201 to 500 dwelling development only suggests a contribution to a Neighbourhood Equipped.
- Area for Play – ridiculously lenient on developers and showing a lack of ambition in this policy.

Public response

- Queries if additional demand in area that has 600+ houses planned is considered - thinks figures 6.2-6.4 are unclear.

Figure 6.3: Guidance on standards of formal outdoor space provision

Town and Parish Councils

- Concern that allocation of 1.2 football pitch per 1000 is an under provision.
- Dorchester Town Council considers that the walking distances in the main document (at figure 6.3) should be enshrined in policy.

Public response

- The walking distances in figure 6.3 are good as guidance - can they be enshrined in policy somehow to make the requirement stronger?

Figure 6.4: Guidance on standards of built recreation facilities

Town and Parish Councils

- Figure 6.4: Guidance on standards for built recreation facilities does not appear to readily match with the proposed approach for such villages to be within a 15 minute car-borne trip (or 30 minute public transport) distance of the towns – and should be amended for consistency.
- Figure 6.4. The bottom right hand box reads ‘inute’ drive time rather than ‘minute’.
- A 30 minute car-borne trip would seem excessive.

Public response

- Driving time of 30 mins from rural areas is unrealistic unless roads are national speed limit, suggests distance might be better - policy assumes car access, should consider journey time and cost on public transport.

Five minutes' walk from green space

Local community groups (non-statutory)

- The Ramblers is calling for legislation to ensure that that no one lives more than five minutes' walk from green space, by requiring national targets for access to nature under the Environment Bill – suggestion that the Council sets that figure as its own target, and that this could be included in the policy.

Viability

Developers/Landowners/Agents

- Clarification is required on the evidence that has been used to underpin this policy: and how the standards for the provision of new recreation, sports facilities and open space and the retention of existing assets in Figures 6.2 to 6.4 have been calculated.
- Need to ensure it has all been considered in viability testing.
- Until the policy has been viability tested the wording should state that the requirements of the policy are subject to viability.

Public response

- Revise drafting of policy to introduce greater flexibility around viability.
- Approach does not consider the increase in cost for the person looking to use the facilities, or the fact that once indoor facilities are created they are often repurposed.

Impacts of provision

Cranborne Chase AONB Team

- Concern with external lighting at sports facilities and open space – should have reference to any external lighting complying with International Dark Sky criteria and lighting needing to be approved by the local planning authority to ensure that it is compliant.

Public response

- Concern that road infrastructure is insufficient.
- Queries parking available near these facilities, car will remain the primary transport given lack of public transport in Dorset.
- There should be more liaison between health and LPA to support ageing and growing population and encourage physical activity.
- The section should mention biodiversity/GI improvements - IUCN document sports and urban biodiversity provides suggestions.

Loss of existing facilities

Sport England

- Would welcome discussions surrounding loss of golf courses.
- Sport England will object to the loss of playing fields or any allocation which prejudices the use of a playing field.

Local community groups (non-statutory)

- Safeguarding existing facilities is a particularly important statement.
- Facilities in place in villages should be retained and would provide for an increased population if limited sensitive housing was proposed - is vital these are supported.

Town and Parish Councils

- Highlights the importance of retaining existing recreation/sports facilities/open space.

Public response

- Concern that the policy is at odds with proposed development of Sturminster Marshall golf course.

5.2. Policy

Criterion I

Town and Parish Councils

- Part (i) of the policy is not clear as to the thresholds that would be applied for the provision and would usefully reference the standards to be applied.

Local community groups (non-statutory)

- Lots of community infrastructure has been lost and will continue unless the plan insists on its provision - need to strengthen 'will be expected' and 'should'.

Public response

- Part (i) of the policy is not clear what thresholds should be applied – it should directly refer to the standards.
- Suggestion that the policy requires strengthening - use of "will not be permitted" is much stronger than "should not be permitted".

Criterion II

Town and Parish Councils

- Policy COM4, criteria II - should be more strongly worded than 'consider' and funds 'should' be ringfenced.

Criterion III

Sport England

- Criterion III bullet point 3 gives cause for concern. Sport England has produced economical designs for a wide range of sports uses. all buildings should have an environmental sustainability appraisal.
- Some leisure proposals such as leisure centres should be subject to a Built Facilities Strategy, including use of Sport England's Facility Model.

Developers/Landowners/Agents

- Support the requirement for new facilities to be of high quality and innovative design.

Criterion IV

Historic England

- Policy COM4, criteria IV - additional bullets should require proposals not to negatively impact on the World Heritage Site, seascape and heritage assets.

Criterion V

Sport England

- COM4 (V) - Single pitches are not viable so having a single pitch as part of housing development is not sound. Suggestion that it is more suitable to have off-site contributions or pooled towards creating multi-sport hub.
- Criterion V bullet point 4. The site should be marketed for not less than 18 months in appropriate websites/publications.

Historic England

- Policy COM4, criteria V, and text should set out how impacts on facilities and open spaces that are heritage assets are to be considered. Suggestion to cross reference with policy ENV5.

Public response

- Suggestion to remove the clause allowing loss of existing amenity if an alternative is available - is a green light for development in areas where provision exceeds the bare minimum.
- Policy implies that development will not be permitted unless there is a replacement and with clear community benefit.

Additional criteria

Developers/Landowners/Agents

- There should be confirmation within this emerging policy and its supporting text that the requirements for the provision of on-site play areas is restricted to market dwellings, not C2 uses.
- Only certain open space types should be considered necessary for C2 uses, and the policy should clearly denote what would or would not be required for these developments.

Public response

- Standards should be mentioned in policy and not just text.
- Fails to make any reference to the importance of consulting Sport England in the provision these facilities.

6. Policy COM5: Hot food takeaways

6.1. Approach

Overall approach

Town and Parish Councils

- Support for the approach.
- Concern that the approach would be problematic and is not the right approach.
- Suggestion that the issues is with adults as well as children.
- The policy needs to demonstrate alignment with licensing policy in order to exert appropriate control over mobile facilities.

Dorset Cyclist Network

- Support for the approach.

Bridport Area Neighbourhood Plan Joint Councils Committee

- Agreement that councils should restrict hot food takeaways around areas where children and young people congregate – in relation to new applications.

Public response

- Several comments of agreement with the approach
 - For health reasons
 - Due to litter issues
 - To remove temptation
 - Due to smell and amenity impacts of takeaways
 - Where evidence of high levels of obesity, deprivation, inequalities, and poor health
- Several comments of disagreement with the approach
 - Disagreement with the approach because it is too controlling
 - NPPF requires policy to be justified
 - Due to potential economic impact
 - Suggestion approach is unworkable
 - Young people will congregate in such places if they wish
 - Concern with the subtext of the policy

Lack of evidence

Public response

- Query what evidence is there that the approach benefits children.

Paragraph 6.5.5 - Five minutes' walk / 400m radius

Town and Parish Councils

- Aim needs to be stated more clearly, or radius will need to be reduced significantly, to a level where it becomes meaningless.

Public response

- Query the evidence that suggests 400m is an effective distance to reduce consumption and litter.
- Suggestion that a 200m buffer would be more reasonable - 400m is excessive.
- The policy should be strengthened with a larger buffer around schools.

Definition of 'hot food takeaway'

Town and Parish Councils

- Clarity needed over definition of 'hot food takeaway'.
- Consider it is important that policy also controls restaurants that are also takeaways.
- Pubs also cause antisocial behaviour, and these are not restricted.
- Paragraphs 6.5.4 and 6.5.5 – query how does this proposal interact with the new Class E Use Class introduced at National level?

Public response

- Need to restrict national chains.

Definition of a 'facility frequented by children'

Public response

- The policy and should also include bus stops.
- Hot food takeaways should be restricted near schools.
- Suggestion that there is no basis for restrictions around primary schools - held at appeal as no/weak link between incidence and proximity.
- Inclusion of play areas, skate parks, leisure centres and youth centres is also problematic as research tends either to be statistically or observationally focussed on secondary schools or the lunchtime and after-school diet of their pupils.

Cumulative impact / density of hot food takeaways

Town and Parish Councils

- Concern with the number of new takeaways especially on new sites.

Public response

- There seems to be an enormous number of takeaways.
- Should provide means of limiting density of outlets in an area, regardless of how many children nearby.
- Public Health England maps/data on 'fast food outlets' density includes uses in former Classes A1, A3 and A5 and so cannot determine proliferation or concentration of hot food takeaways specifically - these other uses can often constitute more of a problem.

Impact on existing businesses

Town and Parish Councils

- Query will this restriction also apply to a business already within this zone or will it only be applied when a change of ownership happens?
- Need to clarify whether the policy would preclude development of any new community facilities near to an existing hot food takeaway.
- Concern that the approach would impact on businesses that need support.
- The policy is probably not workable in an urban community and, due to the decline in retail, would also prevent empty retail units from being converted.
- Concern that the approach would stifle possible economic growth in areas near schools or parks.
- As written this policy prevents any new hot food takeaway outlets in Dorchester - and would presumably also make takeaways impossible on the proposed DOR13 site.

6.2. Other issues:

Free market/other approaches

Town and Parish Councils

- Parents/individuals should take responsibility for their own wellbeing.
- Further thought into other ways to tackle childhood obesity should be explored.
- Consideration of waste, low carbon packaging, recyclable packaging, and waste collection are important.

Public response

- The Council should not unreasonably interfere with activities of local businesses.
- Parents/individuals should take responsibility for their own wellbeing.
- Hot food takeaway is a fact of modern life – should be addressed through other means.
- Do not agree that this is a sensible or equitable way of addressing the issue.
- Approach would restrict possibilities within villages.
- Obesity should be solved by education not prohibition.
- National level intervention is needed instead.
- Access should be made for families on low incomes to have access to breakfast/dinner clubs for children where they cannot be fed and access to food banks is difficult.
- Need to consider the impacts of being able to order online for delivery.
- Council should control packaging/disposal of packaging for takeaway food.

Healthy food

Public response

- Companies that offer healthier takeaway food should be encouraged.
- Takeaway food is not always unhealthy – street food.
- Some young people are expected to buy their own food and educational establishments don't always provide healthy hot food on site.
- Hot food takeaways could provide healthy eating products and could be monitored by food standards agencies.

Congregation

Town and Parish Councils

- The police would be able to monitor the situation easily.
- Social congregations of young people are a different consideration and takeaway outlets are often in areas where adults and families might also congregate.
- Wherever you have the hot food takeaways the young people will congregate.

Public response

- The reasons for the congregating of young people should be addressed.
- Council should support/deliver facilities for young people to discourage them from congregating around hot food takeaways.
- Should also consult with local police about this issue - suggestion that such places are used for illegal activity.

Highways

Town and Parish Councils

- Concerns over vehicle safety near HFTs - often dangerous parking and overlap pedestrian crossings - risk to pedestrians.
- Vehicular access to/from hot-food takeaways needs to be carefully considered.

7. Policy COM6: Education and Training Facilities

7.1. Approach

Overall approach

Town and Parish Councils

- Support for the approach and policy wording.
- New education and training facilities should be built to cater for future expansion and not just for what is required at this point in time.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Agreement with the approach.

Beaminster and Villages Local Area Partnership

- There appears to be a lack of consultation with the Education team at the council.

The Grove Medical Centre

- Public services and infrastructure are not given enough consideration at planning stage in consultation with community – contrary to the plan vision.
- The policy should include how a timely and detailed review of services in community development carried out and shared with public sector colleagues at least.

Public response

- Some agreement with the suggested approach.
- Concerns with the broadness of the approach.
- Approach may encompass removal of existing educational facilities and should be to maintain and enhance.
- Policy is the wrong way around - addresses reasons for NOT providing education and training facilities.
- Wording needs to be strengthened to ensure viable access to education facilities.
- Proposed large increases in housing for an area should be explicitly tied to increasing school and medical facilities in the plan.
- Concern with the lack of standards for new/replacement/extended education facilities.
- Need for parking standards at school sites.
- The need is to ensure that the inevitable increased demand on these facilities will be met and how developers will contribute to the cost.
- Should consider U3A.
- Section does little more than state the obvious – that new developments should make financial contributions to the provision of educational facilities.
- Need to enable employment and learning and training opportunities for young people - economic advantages for shops, pubs and restaurants.

Climate Change

Town and Parish Councils

- There should be a commitment that any building permitted will be delivered to a very high standard with regard to climate change policies and durability.

Public response

- Potential for sustainable zero carbon design, should be included in policy.
- Building will be to a very high standard with regard to climate change policies and durability.

Heritage

Historic England

- Add bullet to COM6 to require consideration of the impacts on the historic environment.

Travel / Accessibility

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- There is some distance to travel to post-16 educational & training facilities from the BANP area.

The Grove Medical Centre

- Need to be more proactive in provision of education facilities and take into account needs of children to attend their local school and avoid unnecessary car journeys.

Public response

- The policy should be to resist reduction and reduce travel time - should make explicit.
- Suggestion that traffic fears mean children will not walk or cycle.
- Pressure to centralise education and cultural facilities increasing travelling time for users.
- Travel to school areas should not be increased in order to provide new facilities or to combine existing schools to reduce costs. Journey time is unproductive and expensive.
- Concern with school shortages and children having to travel many miles at present to suitable schools - should be built into policy.
- All secondary school children should be enabled to walk or cycle on their own to school by the prioritising of missing links in existing cycle routes and the creation of new cycle routes linking schools to residential areas.
- Concern with travel distances and poor public transport provision in the Western Dorset area.
- Statement on public transport use and reduced drop off areas has not worked.
- Paragraph 6.6.1 - phrase “reasonably close or accessible” is too loose and requires definition.
- The buses to existing Colleges like Yeovil are so poor youngsters realistically cannot go there.
- Good transport links should be provided between education/training facilities and residents.

7.2. Schools, further education, and other facilities

Schools

Wiltshire Council

- Wiltshire residents living at Mere and Tisbury use Gillingham and Shaftesbury secondary schools - it would be helpful to have reassurance that there will be adequate places available to meet the needs of these residents.

Town and Parish Councils

- Considers that further school places will be needed at Frome Valley First School.
- Lack of any real understanding and evidence of the strategic coverage and functioning of school facilities and how this may be influenced through the Local Plan.
- Schools have been built based on current school rolls and within 2 years have had to have mobile classrooms installed due to an increase in pupil numbers.

Pegasus Group on behalf of Persimmon

- The A30, Shaftesbury site appeal proposals make provision for land to be used for a new 2 form entry school and playing fields.
- There will also be extensive new school provision provided by Persimmon and its development partners as part of the North Dorchester proposals.

Beaminster and Villages Local Area Partnership

- Housing that does not attract young families will impact on school provision.

Public response

- General capacity issues at local schools.
- Verwood needs an upper school.
- Not enough school places for children in Verwood.
- Concern with potential reduction in spaces at Hillside First school.
- Schools in Lytchett Matravers are oversubscribed.

Further education

Town and Parish Councils

- There is a lack of higher education establishments.
- Please note the lack of and need for post 16/18 college and apprenticeship opportunities in Bridport, the effect of which is exacerbated by poor public transport links to the nearest alternative provision.
- Should be noted that being in the Western Functional area students currently have some distance to travel to post-16 educational & training facilities.
- Tertiary education in rural skills is needed in Bridport and across Dorset and should be catered for in this policy.
- Suggestion that Bournemouth University, Exeter University and Weymouth College should be invited to open off-site facilities in Bridport, Dorchester, Gillingham, Sherborne, and Shaftesbury to feed the local demand for further education and apprenticeships.
- The Plan should include policy/strategy to encourage higher education institutions in Dorset.
- More opportunities need to be provided for young people to access further education and work skills in new and developing technological and environmental industries - the plan should highlight the need for investment in this area.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- There is some distance to travel to post-16 educational & training facilities from the BANP area.
- Some further education needs within the BANP area are not currently being met.

Public response

- High need for post-16 training/education in West Dorset- transport problems accessing colleges and problems with distances.

- Tertiary education in rural skills is needed in Bridport and across Dorset and should be catered for in this policy.
- Support the Bridport Town council proposal for supporting the provision of an agricultural college in the Bridport area, and consideration of Vearse Farm as a suitable location.

Other education or training facilities

Town and Parish Councils

- Library provision must be fit for 21st Century.
- Adult Community Learning is not mentioned in Policy COM6 - may be linked to other education facilities but this element of education is an important part of wellbeing among older and remote populations.

Public response

- Due to threat to jobs because of new technology vitally important for people to frequently learn about new technologies and how they can work with the technology – query where people will gain this knowledge and expertise.
- Dorset has an innovation park mostly for people from outside Dorset because there are very few places in Dorset where they can obtain the requisite knowledge and skills.
- The Plan does not address the issue of establishing a dedicated facility where local people can learn the high tech skills they will need to stay in the job market.
- Traditional education establishments are not equipped or focussed on this very specialised market. The DCLP should lead in creating this resource but is not.
- The Plan does not mention 'training'.
- How about a specialist training College for the Hospitality & tourism sector?
- A Specialist centre to encourage online businesses. How to promote your creative & artistic talent in the digital world.
- A local college providing the opportunity to learn vital skills for the future on our doorstep.
- Comment that Dorset Plan cannot influence education provision delivered through academies.
- Need for specific provision for specialist education settings for disabled children or with learning difficulties.

7.3. Policy

Criterion I

Town and Parish Councils

- The policy wording is unclear as to when the loss of facilities will need to be re-provided, as this section is shown as a sub-bullet for considering proposed for new/replacement facilities only.

8. Policy COM7: Creating a safe, efficient and low carbon transport network

8.1. Approach

Paragraph 6.7.1 - Transport issues and car use

Town and Parish Councils

- Cars need to be used in rural areas where public transport is not viable. Therefore, road structures, repairs and maintenance need to be given a high priority.
- The rural network of roads within the Parish is unsuitable for any increases in traffic, which should be deterred and reduced.
- Plan does not address the transport issues in Dorset (e.g. enhancing key connections), poor quality road system (creates congestion, delay and inefficiencies), poor quality public transport in rural communities.
- Paragraph 6.7.1 appears to focus on the rural population as being the main source of car-borne trips, when in reality over 50% of the urban population travel to work by car.
- Dorchester has been left behind in the provision of cycle routes and public transport.
- Need for evidence that the Council will provide for rural communities - There is a need for infrastructure improvements particularly in West Dorset – poor bus services / no trains / little encouragement for walking and cycling routes etc.
- Suggestion to improve some existing “Ancient Ways” to provide routes between villages.
- Query where in the Plan are the robust policies to ensure the development of an improved infrastructure provision? The current absence of an adequate public transport system undermines achieving the sustainability required by many of the goals in this Local Plan.

Portland & Poole CPRE

- The railway line between Wareham and Norden is not included in the map of transport infrastructure. This approach is ignoring the established environmental constraints that could be no increase in road capacity across Purbeck.

Highways England

- Transport and road safety considerations should be identified as a key objective of the plan.

Community groups (non-statutory)

- Plan needs to cover the implications of the traffic which is associated with tourism; People need to be able to walk/cycle/ride out into the countryside from towns and villages without resorting to cars; There are good examples of trains being used in this way e.g. the Wessex Wanderer walks, run by Ramblers, which start and finish from stations on the Weymouth to Bristol line.
- No major roads in Dorset, so all traffic, cars and HGV Lorries, come through small areas creating blockages and pollution. Reducing traffic like this is imperative, but must be balanced with employment needs.
- Local Plan should be integrated with a strategic vision for transport in Dorset - It is not adequate to treat accessibility as a separate exercise once the parameters of spatial planning have been decided.

Chris Loder MP

- Transport issues need to be considered at the earliest stages of plan making, need more detail - the issues at the beginning of transport connectivity are not addressed throughout the plan, rather the opposite by centralising housing in town extensions rather than dispersing it across the whole area.

Public response

- The roads around get gridlocked - heavy lorries are detrimental for small towns.
- Rural roads becoming more and more rat runs.
- Commuter routes in Dorset are poor.
- The proposed locations for new homes are likely to generate large numbers of vehicle trips.
- Aim to reduce the use of private cars, as the possible switch to electric vehicles works through.
- Concern about accessibility for people who do not have use or access to a private car.
- Plan says nothing about safe connection to local roads, i.e. the sort that would link a new development to a town centre.
- Aim to reduce car use, rather than to avoid “significant additional” trips by car.
- Lack of sustainable travel in Dorset - a cycle path for 20 commuters does not count.
- Road based Transport is one of the biggest sources of carbon emissions and other pollution and should be prioritised as an area to address in the Local Plan.
- Why is the council encouraging new employment development at Dorset Innovation Park (Winfrith) in an unsustainable location.
- New housing development should be located close to employment or public transport to reduce the threat to global warming.
- Plan should focus on the ability of the highways infrastructure to cope with an increase in trip generation.
- Without infrastructure to enable alternative means of travel most will be using cars which does nothing to reduce climate change.
- Existing roads are congested - there should be investment in railway links/services to support development.
- Poor quality road system (creates congestion, delay and inefficiencies).

Paragraph 6.7.2 - Settlement hierarchy and spatial strategy

Town and Parish Councils

- A place-based approach is needed to deliver net zero transport emissions.
- Location of development on a transport corridor does not deliver transport on that corridor.
- Recommend that parishes be given incentives to encourage planned cooperation for the provision of local services such that car reliant travel to towns is minimised.

Southern Western Railway

- Important to assess the combined transport impacts of groups of sites and not on a site-by-site basis. The policy as it stands makes it difficult to secure funding contributions for the combined impacts of several different settlements.

Go South Coast Buses

- New developments are taking place in unsustainable transport locations often in larger rural counties - results in social isolation, lack of access to services etc and forces people to the private

car. Planners work within the red line and connection of transport to the site is often excluded - leading to isolation.

Bournemouth Transport Ltd trading as Yellow Buses

- Lots of sites not in suitable locations for bus services.

Community Groups

- Location of development on an existing transport corridor does not deliver net-zero carbon transport on that route.

Developers/Landowners/Agents

- The proposed developments in SE Dorset will not reflect the requirement of Policy COM7 that all development should be in the most accessible locations and reduce the need to travel. This is because the development strategy in SE Dorset is overly weighted towards less sustainable, 'outlying' settlements. There should be a greater focus on locations close to the SE Dorset urban area that have more direct links with it.
- Avoiding a reliance on the private car does not mean that all development must be located immediately adjacent to a large urban area.
- A greater focus should be at strategic locations at or close to the edge of the South East Dorset urban area that have more direct links with it.

Chris Loder MP

- Plan constitutes shift away from village life in favour of urban life. This will mean that village bus services will not be viable and villages become more isolated. Plan should pursue an inclusive option of the whole area and not just large towns.

Public response

- Locating large housing developments in areas where there is no work will increase congestion, carbon emissions, parking problems etc.
- Ideally work opportunities should be near where they live.
- Developments which depend on additional road transport should not be favoured in the plan.

Paragraph 6.7.3 - Walking and cycling

Town and Parish Councils

- Support for development of cycling networks.
- The council should provide more, safe cycle routes.
- A 'hub and spoke' transport approach should be considered and include reference to the Bridport Bus Station Transport Hub, BANP Policy AM6.
- Concern that money for walking and cycle routes is not making its way to local villages in the west of the county.

Public response

- Transport is very poor and cycle links cannot solve this - unrealistic, they need to be part of a planned network to a town centre or local attraction making a complete route with destination cycle parking.
- Vital that the Local Plan, together with the Transport Plan gives as much support as it can to the continued development of the National and local cycling networks.

- Sustainable transport should be well-designed to the criteria set out by Sustrans, will prove to be a boon to many people with disabilities.
- Cycle routes should be signed to request consideration for all users including elderly people, young children, and people with disabilities including hearing or sight impairment.
- Cycle Paths: DC to work with local communities to see how routes can be safely joined up.
- Welcome the expansion of the cycle network in Dorset by the creation of cycle & walking paths.
- Appears to be little tangible support for government cycling and walking strategy.
- Must provide safe cycle routes and electric / non electric cycle parking in all new developments.
- New development which makes provision for walking, cycling and public transport and improves it for existing development should be the focus.
- Local plan policy should include policy requirements to support delivery of:
 - dedicated routes or surfaces for walking and cycling;
 - widening pavements; and
 - specifically safe cycling routes between Beaminster, Bridport and Crewkerne.

Paragraph 6.7.4 - Public transport

Town and Parish Councils

- COM7 needs to take more account of the need for public transport in rural areas.
- Concerns about accessibility for those without a car.
- Give more priority to public transport.
- Consider needs of all users.
- Use the existing school transport network as public transport in rural areas - during the day minibuses are waiting for the afternoon pick-up from school – but could provide essential transport to the market towns.
- Dorset has incredibly poor transport and infrastructure: small number of short dual carriageways, poor rail links, unmanned railway stations with no disabled access.
- Plan contains much on the need for better public transport, promotion of active travel and reduction of car dependency, but there appears to be no strategy for improving public transport.
- A ‘hub and spoke’ transport approach should be considered and include reference to the Bridport Bus Station Transport Hub, BANP Policy AM6.
- Re-regulation of bus services.
- Existing towns and villages are currently poorly served by public transport making the use of cars essential - opportunities for existing communities to use public transport need to be improved.
- Importance of maintaining existing rural bus services.
- The Council is encouraged to investigate new local rail services.
- Local affordable rural bus services must be increased - Lack of subsidy for public transport outside Dorchester and Weymouth.
- Sustainable transport should be well-designed to the criteria set out by Sustrans, will prove to be a boon to many people with disabilities.

Network Rail

- Appears to be no vision or aspiration for developer funding of enhanced public transport, for example increasing the many two hourly bus routes linking urban areas up to an hourly or better frequency, nor towards improving bus-rail interchange, for example at existing railway stations, or funding earlier or later services to encourage modal shift.

- Absence of any clear policy regarding service levels, for example, perhaps seeking hourly services for all settlements above 2,000 population or increasing the proportion of homes in urban areas within 400 metres of a bus service running at least every 30 minutes.
- Given ongoing revenue funding issues there is no mention of any kickstart type funding where developer contributions could be used to provide initial funding for bus services that will become commercial after five years, nor of Quality Bus Partnerships with local operators.
- Arguable that the fact that there has been so much out of town development for retail and employment in recent years, that irreparable damage has been done to many towns and their traditional town centres with many of the new developments being difficult to serve by public transport modes.

West Dorset CPRE

- Public transport needs to be greatly improved (or even put in place at all), especially to remote villages, and fully financed.

Swanage Railway

- DCLP abandons the Swanage-Wareham train service as a strategic transport link.
- The Purbeck LP proposes to include rail infrastructure under community facilities however loss of policy wording in the DCLP is a step back.

Go South Coast Buses

- County buses have been declining, and the number of journeys taken has declined too - massive funding gap shows need for funding and network development to be prioritised in a new manner, acknowledging the contribution transport makes to other policy areas.

Community Groups

- Existing park and ride areas should be expanded and new ones established to control parking provision and manage visitor traffic, including areas with facilities for motor caravans.
- Concern with poor public transport in towns and villages making car use essential.
- Fundamental issue with lack of public transport - needs addressing on a wider level.
- Regret over loss of small railway lines.
- We need smaller buses that are more frequent and are electric.

Federation of Small Businesses

- People will be looking to relocate from urban centres for a lifestyle choice. Reliable Superfast broadband across the county and public transport infrastructure will be critical to enable Dorset to capitalise on this opportunity for skills and money into the economy.

Environmental groups (non-statutory)

- Beaminster and surrounding villages need improved provision of public transport in the form of:
 - regular bus services or of community buses;
 - extensions to timetables to cover evening and weekends;
 - co-ordinating bus and train timetables at Crewkerne and other stations.
- Policies/strategies in the local plan should build on the experience of the number 6 bus and the CB3 Saturday service for Beaminster led by the Town Council and run by volunteers.

Public response

- Need public transport infrastructure that enables young people to travel around the county to optimise their opportunities.

- The Plan should be developed in the context of the existing public transport infrastructure, particularly in the Western Dorset Functional Area and the more rural east and north areas.
- Plan lacks reference to transport, does not tie in with DC Plan which aims to: 1. “Make public transport better and help the environment” and 2. “We want to connect communities with better transport”.
- The town ‘hubs’ of Dorset should all be connected by high-quality public transport routes - hinterlands would be served by ‘spokes’ relying on traditional public, community, and on-demand forms of transport.
- Vital that the Local Plan, together with the Transport Plan gives as much support as it can to the maintenance and improvement of train and bus services, to the better provision where appropriate, to accessible boat services.
- Transport accessibility should not be treated as a separate exercise.
- Development should be located on public transport routes – but the plan, in conjunction with a proactive transport strategy, should work harder to ensure that these routes provide sufficient public transport to offer a viable alternative to the car.
- Poor availability of public transport which has been severely cut.
- Public transport is an essential public service and is critical for reducing carbon emissions.
- Lack of recognition that public transport is poorly funded.
- To reduce car use - need more connectivity – smaller – more frequent bus service. Electric.
- Public transport links to villages and outlying settlements should be subject to greater focus and support.
- Support bus operators to provide linked services.
- DC should put pressure on Network Rail to update the Salisbury-Exeter line incl. car park extensions.
- Provision of improved public transport, including bringing back into use old rail connections, should be one of the Local Plan’s priorities.
- New development which makes provision for walking, cycling and public transport and improves it for existing development should be the focus.
- High quality public transport between centres of population should take centre stage.
- There must be actual buses not just a bus route close to housing.

Paragraph 6.7.4 - Planning application requirements

Town and Parish Councils

- Previous travel plans and transport assessments have been wholly inaccurate or not realistic.
- Concern that investment/improvements to infrastructure secured through earlier development will not be delivered.
- Concern with the use of “Where appropriate” for the need for travel plans and transport assessments - why is this not “appropriate” for every development of say over 10 houses?

Southern Western Railway

- Need to be clear which developments should be accompanied by travel plans and undertake transport assessments.

Community Groups

- All development should be conditional on traffic management plans and mitigation measures.
- There should be a coherent transport plan supporting all new developments.

Bournemouth Transport Ltd trading as Yellow Buses

- Bus infrastructure needs to be delivered as part of the plan including pump prime funding for new bus services.
- Funding best provided through S106 agreements.

Public response

- Would like to see inclusive communication in travel plans, in the cycle networks, and the walk to school has got to cater for children that live with disabilities.
- Planning applications for all significant new developments should be accompanied by a coherent transport plan, in that these developments shall be truly 'sustainable'.
- The Local Plan, in conjunction with a Transport Strategy and Development Control provisions, must ensure that such transport is provided over the lifecycle of any development.

Paragraph 6.7.5 - The Climate and Ecological Emergency

Town and Parish Councils

- The concept of Eco Towns should be considered as a model for Bridport and other Dorset market towns, as a strategic objective in the plan from which transport needs will flow.
- A reduced carbon footprint will not be achieved if employment opportunities are not provided near to residential areas, leading to reduced car use.
- More electric charging points and support for hydrogen cell vehicles would be a small step forward.

Community Groups

- The policy should ensure that zero-carbon transport solutions are delivered for the entire lifecycle of any development, not merely the first few years.
- Paragraph 6.7.5 – amend the second sentence to: “Locating growth in places with good, sustainable transport links and jobs and services, thereby reducing the need to travel by private car will help to mitigate the climate change impacts of increased growth and development” - impact of home deliveries on the transport network and carbon emissions should be addressed.
- Concern that section is inadequate in cutting greenhouse gas emissions.

Public response

- Little reference to road planning and specific travel planning to enable easy, minimum mileage and environmentally clean means of moving between major towns and new developments - a few cycle lanes and minimal EV investment will not scratch the surface of the climate emergency.
- Transport is the biggest contributor to carbon emissions in Dorset, but there is no credible plan for improving vehicle, cycling and pedestrian networks to achieve the essential reduction in carbon emissions whilst increasing the housing stock.
- Council should be prepared to make radical changes to its LP if the take-up of EVs grows rapidly.
- Move from fossil fuelled vehicles to EVs is not taken into account in the planning process.
- Plan should include policies to cut transport-related CO₂ and noxious gas emissions to zero and reduce other pollutants (particulates etc.) to below safe levels.
- Reference to RTP research - need for a comprehensive package of interventions to reduce transport emissions – policies should first reduce the need to travel, then shift trips to active travel (walking, cycling), then to public and shared transport, and finally a change to vehicles using cleaner fuels.

- Plan must offer a net-zero-carbon approach to accessibility-cum-transport, and carbon balance overall, taking into account the energy required for electric vehicles.
- EVs will resolve the conflict between the consequences of increased development and the use of the internal combustion engine.
- Research by the Royal Town Planning Institute specifies the need for a comprehensive package of interventions to reduce transport emissions - advocate policies which firstly help reduce the need to travel, followed by shifting trips to active travel (walking, cycling), then to public and shared transport, and finally a change to vehicles using cleaner fuels.
- This hierarchy acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities.

Area specific issues/suggestions - South-Eastern Dorset

Community Groups

- Lack of public transport has been causing problems in West Dorset for many years.
- Need to improve connectivity in the Purbeck area with its limited bus services. Important role for rail travel, both on the Swanage Railway and on the Bournemouth-Weymouth line.
- Purbeck Transport Action Group's Transport Strategy for Purbeck could be supported by plans for: traffic management; cycling/walking; integrated public transport, coordinating and expanding bus and rail services and the Sandbanks Ferry.

Public response

- Access to Verwood from Three Legged Cross is difficult during busy periods - traffic consolidated in this area on Manor road will cause huge congestion.
- Repairs due already to St Michaels Road and Howe Lane, increased works traffic will ruin these surfaces further. Weight of traffic in rush hour already an issue for Three Legged Cross and West Moors. Weekend traffic to Potterne Park already leads to car park overflow on to the main road.
- When walking along the B3081 -the pavements are very narrow and the noise and air pollution coming from the already busy road is horrendous.
- Active travel is not mentioned despite the links to Potterne Park.
- East Dorset has highest number of workers in the country commuting by car or van - 79.5%.
- New bridge crossing at Longham is essential. Longham near to the dump or Kinson.
- The new bridge and roads over from Airport to recycling waste at Watery lane could be considered. Dualling A31 would help.
- Access to the coastal could be affected and the economy too. Cycling could be improved a paved route by river over to Castlepoint.
- Undertake a feasibility study to assess value of creating a Wareham Town residents parking and app charged visitor street parking service.
- Functional cycle route from Wareham to Poole (then round the harbour) via the railway route should be prioritised and would be a tourist attraction.
- Plan should support ongoing work to connect Swanage and Wareham via rail.
- Swanage to Wareham line – passes (reduced ticket prices) for residents.
- Cycleway along Upton bypass of little use, need cycle route along Dorchester Road extending route from Bakers Arms roundabout to Upton House and Country Park.
- Pedestrian and cycleway access between Upton and Lytchett Minster poor due to severed route between Watery and Old Watery Lane.

Area specific issues/suggestions - Central Dorset

Town and Parish Councils

- Improvement of Weymouth's Park and Ride should be a priority.
- Nothing on cycleways on Portland. Portland is on the National Cycle Network. The Town Council are keen to move forward on the creation of specific routes for cycling on the island. Portland urgently needs a cycle path from Underhill to Tophill. The local transport plan should be further integrated with the local plan to detail this.
- A new access should be formed between Crossways Village and Moreton Railway Station.

Community Groups

- Lack of public transport has been causing problems in West Dorset for many years.

Public response

- Cycle path to link Dorchester and Charlton Down.
- Give more priority to public transport and park and ride in Weymouth.
- 2 buses a week to market towns from Thorncombe - if we want to reduce car journeys we need regular daily bus service for rural villages into urban character areas.
- No proposal to double the railway line between Dorchester and Moreton.
- Create dedicated bus lanes on the dual carriage way between Weymouth and Dorchester.
- There is a very strong need to complete the A35 as dual carriageway to the Stanford roundabout as planned, there are often long tail-backs and accidents on the single carriageway section.

Area specific issues/suggestions - Northern Dorset

Town and Parish Councils

- The plan does not include a policy relating to the extension of the North Dorset Trailway/proposals relating to North Dorset Railway at Shillingstone/Bere Marsh.

Wiltshire Council

- Potential for growth at Gillingham to have impacts on the highways network in Wiltshire - please keep Wiltshire Council informed of relevant traffic modelling work, etc.

North Dorset Trailway Network

- Council should encourage creation of active/sustainable transport links/routes through the local plan (including extension of the North Dorset Trailway).

Area specific issues/suggestions - Western Dorset

Town and Parish Councils

- Consider the Bridport Renewal Corridor (the plan to reopen the line between West Bay and Maiden Newton).

Jurassic Coast Railway Limited

- Promoting reinstating the 21km West Bay-Maiden Newton Railway.

Community Groups

- Lack of public transport has been causing problems in West Dorset for many years.

Developers/Landowners/Agents

- Opportunities for enhancing transport links along the Stour Valley Corridor, in the form of a guided bus, cycle and footpath corridor have been missed - should include guided bus corridor, cycle and footpath corridor, similar to the Cambridge busways.
- Text on the Weymouth to Portland Relief Road currently in section 24 should be included here.

Public response

- A 10-mile cycle path from West Bay to Maiden Newton should be developed for recreation and as a tourist attraction with a link to Maiden Newton railway station, cycle hire centres, picnic sites and easy access links to pubs along the way.
- Around Bridport, many of the roads are not safe for cyclists.

Transport Strategy/Plan

Town and Parish Councils

- A district-wide Transport Strategy which pays attention to the needs of rural areas must be agreed before the Local Plan is finalised.
- An enforceable traffic management plan is required as a matter of priority. This will ensure that appropriate roads are used rather than the unsuitable rural roads.
- There can be no coherent transport policy in the LP until Dorset Council has reviewed LTP 3 and established a revised comprehensive Transport Strategy to drive modal shift from private cars, promote active travel, and address the poor availability of public transport.
- Recommend that Dorset produces a coherent transport policy to underpin the Local Plan.
- Current strategic network is outdated (both road and rail) and needs a unified strategic approach that recognises that change is required East - West, not just South – North.

Southern Western Railway

- Essential that LTP and LP are written and developed in parallel.

Community Groups

- The Plan needs to have an integrated updated Transport Strategy, enabling people to have access to work and services, either by local provision or by public transport.
- Dorset Council needs an integrated transport plan to link all Dorset communities, reduce private car journeys, incentivise car-sharing, promote public transport and encourage walking and cycling.
- Need for a more comprehensive, strategic plan for a public-transport network plan to mitigate the climate emergency by radically reducing dependence on private vehicles, to enable employment and learning and training opportunities for young people; economic advantages for shops, pubs and restaurants. and to enable key-workers, patients and their visitors to attend hospitals and other healthcare appointments.

Public response

- Plan should provide a summary of existing links and what transport will be required over the coming years with gap analysis to deal with the plan development.
- Plan should summarise plans for transport proposed by other parties e.g. Network Rail proposals and Bridport Renewal Corridor tram service which is mentioned in Bridport Plan.
- Plan for transport is out of date, too much emphasis on the south-east of the area.

- Transport strategy should introduce 4 trains per hour between Weymouth and Bournemouth, 2 semi fast and 2 all stations trains, new National Rail contract frameworks enable greater flexibility in successive yearly business plans.
- The draft Local Plan lacks a detailed transport strategy. Transport needs a chapter of its own, given the linkages with car ownership, carbon emissions, climate change, rural isolation and access to work.
- The council should develop a new transport plan post Covid-19 pandemic.
- Need for a strategic vision on transport in Dorset - everyone should be able to access the facilities needed to lead to healthy, fulfilling lives without imposing intolerable burdens on future generations.

Evidence

Town and Parish Councils

- Dorset Council should publish evidence on the transport impacts and infrastructure proposals of the plan as part of this consultation phase, in order that the implications of this can be properly considered by communities and inform the next stage of the Local Plan.

Community Groups

- More thinking and research needed on road and affordable public transport.

Public response

- Lack of detail on transport infrastructure.
- There is no information about the existing transport, capacity and issues such as accidents - without a transport baseline it is impossible to identify future needs.
- COM7 is not supported by evidence because it is based on an unevidenced settlement hierarchy.
- There is no visual presentation between transport networks and large allocated sites.

Heritage impacts

Historic England

- We would welcome recognition of the relationships between this Policy and the conservation and enhancement of the historic environment in the supporting text.

Alternative/Additional approaches

Network Rail

- Concern that there is no specific policy for minimising the distance travelled and focus travel onto active travel and public transport options.

Community groups

- Community transport schemes can be planned to reduce the need for cars and reduce congestion at peak times.
- We need local car clubs.
- Old railway routes are a potential for electric bikes and scooters.

Public response

- Restrict access of cars into residential areas - concentrate vehicle parking on the edge of development.
- The issue of roads should be addressed before new housing development.

- Road and traffic considerations should be the starting point of development alongside suitability of land.
- Consider ANPR at car parks with differential pricing to emphasise the "polluter pays" principle.
- Community transport schemes can be planned to reduce the need for cars and reduce congestion at peak times.
- Consider 'Park and Ride' schemes which call at rural places and major towns.
- Plan for dual carriageways across the county east to west and north to south to encourage business/employers to locate to the west of Poole.
- Encourage a county wide social enterprise to manufacture, two stroke, recycled cooking oil fuelled, TUK-TUKS - then use for local, urban transport - environmentally friendly, cost effective, low carbon imprint.
- Consider new modes of transport - shared ownership, driverless vehicles which may require establishment of transport hubs and centralised parking vs parking at or on private property;

8.2. Policy

Policy approach

Town and Parish Councils

- The policy should be strengthened to ensure that non-car transport solutions are delivered.
- Concerns that the approach could mean all the developments will be in towns and that sleeper villages will be left untouched.
- Suggest that the local plan should include a requirement for new development to include/incorporate new cycle routes.

South Somerset District Council

- Support commitment to reducing reliance on travel by car and making walking and cycling a logical choice.

Historic England

- Welcome policy as noise, vibration and air quality can negatively affect heritage assets.

Natural England

- COM7. Point 1 is missing from the text box – is this an omission or a numbering error?

Environment Agency

- Support the policy to enable creating a safe, efficient low carbon transport network.

Southern Western Railway

- Policy and section needs strengthening / more clearly defining.

Swanage Railway

- COM7 puts forward no measures to create a safe efficient and low carbon transport network which is contrary to NPPF section 9.

Go South Coast Buses

- Support subject to amendments - support locating housing in sustainable locations and along transport corridors or where development volumes can justify provision of a bus service and allowing public transport network to grow.

Community Groups

- The broad policy aim is laudable, but it needs backing-up with support for bus routes or public transport.
- Section is focused on land use and settlement solutions as distinct from transport itself.

Developers/Landowners/Agents

- Acknowledges the need to promote sustainable patterns of growth and supports the wording of draft Policy COM7. The use of 'should' is important here.
- Consideration needs to be given to the viability of schemes.
- The policy should be reworded to reflecting the changing needs of commuters, in terms of provision of fast charging points.
- The proposed plan development strategy will not achieve the aim that all development should be in the most accessible locations and reduce the need to travel.

Public response

- The Plan is right to seek to reduce dependence on vehicles and mitigating the impact of traffic by managing where and how development will take place.
- The importance of reducing vehicle usage is reflected in several places in the draft plan but the policies and direction of the document fall woefully short in addressing the key issues.
- The travel / accessibility mitigation policies only address the increase in vehicle usage created by the plan itself - it does nothing to reduce existing vehicle usage levels and accessibility issues.
- No date for decreasing reliance on cars, making improvements to public transport and installing new cycle paths.
- Aims are good - will the council be able to require them while resisting claims of non-viability?

Criterion II.

Community Groups

- COM7(ii) Amend last phrase to a more positive encouragement of walking and cycling.

Developers/Landowners/Agents

- Amend policy to incorporate some flexibility in terms of locating development in accordance with the settlement hierarchy.
- Support for COM7 that recognises the need to promote sustainable patterns of growth by locating development in accordance with the settlement hierarchy to facilitate the move away from car dependency.

Public response

- COM7(ii) - amend wording of last phrase to encourage walking and cycling.
- 'Close enough' should consider pinch points and barriers such as rivers, major roads, train tracks etc.

Criterion III.

Town and Parish Councils

- No confidence in the delivery of viable public transport in the long term - policy statement is unrealistic and should be removed.
- Not clear who should provide high-quality public transport connections.

- In the Policy COM7.III bullet 5 says “development will not be permitted where impacts (individual or cumulatively) will be severe”- query the definition of ‘severe’, – a set of metrics or examples should be provided as measurables to avoid debate.

Natural England

- Welcome the ambition to expand the local cycle and PROW network.

Go South Coast Buses

- Needs to be made clear that developers need to provide and fund bus services for a period until they are commercially viable.
- 3rd bullet point is remiss in excluding public transport in the transport hierarchy and the role it plays in reducing car use but welcome final bullet point.
- Suggested amendments to bullet point 3 – “If viable new facilities cannot be provided, high quality public transport connections should be provided AND FUNDED OVER A PERIOD TO BE AGREED BETWEEN THE PLANNING AUTHORITY, DEVELOPER AND TRANSPORT OPERATOR as part of the development...” and “Support active travel AND PUBLIC TRANSPORT which prioritises walking cycling AND BUS USE above other modes...”.

Community Groups

- COM7(iii) Amend first phrase from “If viable new facilities cannot be provided” to “New facilities should be provided”.

Dorset and Bournemouth, Christchurch & Poole Local Access Forum

- Commitment to provide new walking and cycling routes is welcome however, by default should dedicate new routes as public rights of way.
- Needs for equestrian access via public bridleways should also be considered.

Public response

- Lots of mention of requirement for public transport contribution – can we check if all the sites have this in them and if they have then it needs to be part of the generic policy.
- Support for walking and cycling routes but appears to be sentiment with no teeth.
- COM7(iii) - amend first phrase from 'if viable new facilities cannot be provided' to 'New facilities should be provided'.
- Lack of definition of 'active travel'.
- Better public transport is unlikely (and in practical terms will be unable) to replace growing electric car use.

Additional criteria

Town and Parish Councils

- The policy must include a commitment to public transport and other non-car transport solutions.
- The policy should also address issues around the use of small roads by large commercial and agricultural vehicles/traffic speeds in rural areas.

Historic England

- Add new criteria in Policy COM7 requiring transport-related development to conserve, and where appropriate, enhance the significance of heritage assets, including their settings, and wider historic landscape, townscape and/or seascape.

Network Rail

- Level crossings - As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable. We believe that any future developments take into consideration the impact on use of these crossings and any resulting increase in risk. This clearly will require early consultation between the planning authority, developers, and NR to identify ways that any increase in risk can be mitigated. Network Rail's level crossings teams' welcome further discussions.

Swanage Railway

- Suggested addition to COM7 - "The Council will work with and support its partners to create a safe, efficient and low-carbon transport network across Dorset which: a. builds on its location through improvements to road-rail connections and other public transport provision; and b. promotes transport choice through improvements to public transport services, the protection and improvement of public rights of way and promotion of walking and cycling networks, to provide a genuine alternative to the car and facilitate changes in travel habits. This will be achieved through the identification and promotion of opportunities to deliver improvements in road / rail connections, expansion of Dorset's cycle and pedestrian routes, enhancing connectivity between various modes of transport, and supporting the provision of local services and facilities that reduce the need to travel, thus reducing reliance on the car."

Community Groups

- The role of developer contributions (CIL, S106) should be included in the policy and given strength to ensure that non-car transport solutions are required and delivered.

Public response

- Role of developer contributions should be included in the policy to ensure non-auto transport solutions are required and delivered - re-regulation of bus services and the need for revenue support should be considered alongside this policy.

9. Policy COM8: Parking standards in new development

9.1. Approach

Paragraph 6.7.6 - Suitable and sufficient parking

Town and Parish Councils

- Reduced parking in developments provokes disputes amongst residents; in towns it increases anti-social parking on kerbs and in smaller roads.
- Reduced parking does not attract tourists, businesses or shoppers. It also does not stop the use of private vehicles. Parking needs to be rethought.
- Not enough parking spaces provided especially in more rural settlements, leading to on-road parking.
- It makes no sense to underprovide parking, however there is a strong likelihood that car ownership trends will change significantly.

Community groups

- Paragraph 6.7.6 does nothing to encourage non-car solutions.

Public response

- Paragraph 6.7.6 - phrase 'A lack of suitable parking can often cause concern and distress in a local community' fails to acknowledge the possibility of place-based alternatives to private automobility. Re-word or remove.
- Paragraph 6.7.6 - "a reduction in parking capacity or further discouragement of parking, would not necessarily discourage car use" - contentious and unambitious.
- Reduction of parking capacity would not necessarily discourage their use and is likely to cause concern to the community.
- The rural character of Dorset and the lack of public transport mean that the demand for car parking is unlikely to diminish, especially since EVs will replace petrol- and diesel-powered vehicles.
- Should consider needs over long term e.g. houses built in 1960s have small garages.
- Most houses have two cars leading to on-street parking.
- Impossible to deliver on Council own policy to reduce private car use.
- Indiscriminate parking on footways presents a hazard to pedestrians.
- Pavement parking is more a cultural issue than due to lack of parking and results in most vulnerable not leaving homes.
- No space for any more car parks.
- As tourism is a significant contributor to the Dorset economy, parking provision should be an important part of the growth of settlements. Attempts to restrict car use through reduced parking provision and higher parking charges are not the answer.
- On-street car parking can obstruct the highway and create a nuisance/inconvenience for other road users and that not enough provision is made to drop-off/pick-up school children from local schools.

Paragraph 6.7.7 - Cycle parking

Public response

- Cycling should be facilitated by the provision of adequate parking places at convenient locations.
- Cycle parking standards inadequate so is not used but then is repurposed for car parking.
- Should require cycle storage to be permanent.
- Need for electric/non-electric cycle parking in all new developments.

Paragraph 6.7.8 - Parking provision commensurate with the type, size and location of development

Town and Parish Councils

- The aim should be one car per household as an upper limit within a development, through development of associated transport services.
- Car parking is a critical issue and should be recognised as a key consideration in proposals relating to town centre regeneration/expansion.
- Car parking standards should be defined in the glossary for the local plan.
- It is often considered that town centre developments do not need to provide any car parking but this is only true in completely urbanised city centres.

Community groups

- Developers should be free to propose plans with no parking included, provided accessibility needs are demonstrably catered for.

- Aim should be one vehicle per household as an upper limit within a development – alongside development of associated transport services.

Developers/Landowners/Agents

- Lack of parking standards for developments other than residential – i.e. for extra care uses.
- Reference to PPG - parking is a design issue that needs particular consideration in planning for Housing for Older and Disabled People. It is important for parking requirements from these developments to be defined by the Council.

Public response

- New parking in developments and town centres vital to remove need for dangerous parking.
- New developments must have sufficient parking and all with electric charging points.
- Stricter regulations required for garage sizes and number of parking spaces per dwelling.
- Care homes need more visitor parking.
- Housing standards should require space for bike storage - not clear at present.
- Sufficient parking spaces must be specified to ensure that independent trades and self-employed people can park their business vehicles close to their homes.
- Car parking areas should be allocated on the assumption that any built-in garage will be converted into living space.
- Each property should be capable of having double off-road parking thus reducing congestion of parked traffic on the roads.
- Sufficient car parking should be provided.
- Every new home should provide two parking spaces - too many developers ignore this basic need.

Settlement specific issues

Town and Parish Councils

- Car parking on Portland requires a managed approach.

Public response

- Parking in North Dorset developments inadequate, garages barely have room for a car so streets clogged.
- Increased requirement for parking in Wimborne will be significant - Parking already insufficient at peak times.
- Large housing schemes, like Vearse Farm, should encourage operation of Car Sharing Schemes.
- On-street and pavement parking is prevalent in Beaminster and negatively impacts the street scene, as well as causing danger to pedestrians.

Evidence, strategy, and guidance

Town and Parish Councils

- A review of the local parking guidance should be undertaken to ensure it is compatible with both current and future vehicle ownership trends.
- The local parking guidance have less weight applied when determining planning applications.

Community groups

- Parking must be set within an overarching Transport Strategy for Dorset.

Developers/Landowners/Agents

- New parking guidance should be prepared for the area as a whole and consulted upon alongside the emerging local plan.

Public response

- Parking guidance needs to take account of charging points and bin storage.
- The parking standards need to be updated and subject to consultation.
- Standards are insufficient, resulting in more on-street parking impacting traffic flow and safety.
- Parking policies should be set within an overarching Transport Strategy to influence the use of private cars to encourage non-car transport solutions.
- Plan should identify when it is updating its Car Parking Standards SPD and that it will reflect national policy to reduce reliance on the use of the car.
- Car parking standards are based on 2001 car ownership levels and need to be updated.

Alternative approaches

Town and Parish Councils

- No real vision for car share schemes or a joined-up transport system which needs to be facilitated within the parking strategy.
- Car parking charges should be used to provide an incentive to move away from individual car use and incentivise use of electrical cars.
- Policies should be in place to resist garage conversions.

Public response

- In order to maintain capacity where DC proposes redevelopment of urban car parks it should consider imaginative schemes such as building low-rise multi storey car parks faced with shops and/or apartments in keeping with local architecture.
- Consideration should be given to park and ride schemes.
- Towns need park and ride schemes - shops/cafe could be provided at park and ride to help finance.
- Should mention the need for many more places to charge electric vehicles.
- Layout of parking spaces needs to be addressed.
- Parking should be available for motorhomes within towns to boost economy.
- Parking charges should be more flexible (e.g. 30 mins free).
- Encourage street parking and permit it for residents.
- Conduct parking trials first by surveying people living in the area and testing various parking methods and charges.
- Need to restrict parking to respond to climate emergency and develop sustainable transport.
- Need free parking close to shops to keep them open.
- Plan should identify car park allocations and land use and car parks for retention as it may impact centre viability/vitality.
- The approach to car parking should be different in rural and urban areas.
- In rural areas parking areas should not be developed unless they are replaced elsewhere.
- Car parking should be underground.

9.2. Policy

Policy approach

Town and Parish Councils

- This is a 'do nothing' policy that fails to encourage non-car transport solutions.

Community groups

- This policy needs to link to policies on public car parks and on-street parking - to ensure that parking provision is coordinated and to guard against displacement of parking to other areas.

Developers/Landowners/Agents

- Support policy, however difficult to comment without the parking guide / knowing what the standards are.

Public response

- The approach contradicts sustainable travel.
- Concern with the prominence of parking in the plan.

Criterion I.

Town and Parish Councils

- What constitutes 'site-specific circumstances' should be made clear.
- Policy COM8.I is too loosely specified allowing developers to avoid provision.

Historic England

- Support for COM8 criterion I as it is hoped this will enable the impact of parking to be considered against heritage assets. Would like to see this issue mentioned in the supporting text.

Developers/Landowners/Agents

- Do not rely on parking guidance prepared by the former district / Borough authorities.

Public response

- COM8 should refer to detrimental impacts that inadequate parking can have.

Additional criteria

Public response

- COM8 should refer to detrimental impacts that inadequate parking can have.
- Policy should include more to protect spaces used by pedestrians.

10. Policy COM9: Provision of infrastructure for electric and other low emission vehicles

10.1. Approach

Paragraph 6.7.9 - Electric vehicles and charging points

Town and Parish Councils

- Electric cars are not carbon or materials free in production or maintenance.

Network Rail

- While EVs are beneficial in terms of emissions and resulting air quality, they retain many of the disbenefits of diesel or petrol cars, namely causing congestion and road accidents.

Community groups

- EVs are expensive, and they take a lot of CO2 to produce and there are other contributions e.g. tyre tread. Only a tiny percentage of people can afford them, and many don't have a car at all.
- Need to make it attractive for residents to convert to electric cars.

The Grove Medical Centre

- Concern over futureproofing of charging facilities.

Developers/Landowners/Agents

- To provide charging points, parking needs to be on plot, thereby impacting on urban design principles, such as parking courts, historically favoured in Dorset.
- Rather than spending money on expensive EVs, people may choose to car share or belong to a car club therefore reducing the overall need for charging points.

Public response

- Electric vehicles are not sustainable - environmental concerns with production.
- Electric vehicles still cause congestion and need parking and not everyone has access to cars.
- EVs are for wealthier people, not flat dwellers or people without parking spaces.
- The plan should link EV charging points with the issue of climate change.
- UK brought forward to 2030 the ban on new petrol / diesel cars with some hybrids allowable until 2035 - plan says 2040.
- Will not address the climate crisis but should be installed to a level to support equitable transition to a carbon free society.
- EVs instead of a petrol / diesel vehicle will not address the climate crisis due to embedded carbon costs - need sustainable transport systems.
- No mention of the impact of EVs on commuting by public transport.

Paragraph 6.7.11

Community groups

- Paragraph 6.7.11 Amend the sentence with “whilst also disincentivising the use of private cars”.

Developers/Landowners/Agents

- The transition to 100% EVs will still take a significant amount of time - Important future proof development projects without providing the additional infrastructure for a 100% take-up when this will not be used for a significant period of the development's lifetime.

Public response

- The development site will have to be tolerated by the whole community and hence the money for should be spent providing EV charging points throughout a settlement.

Alternative/additional approaches

Town and Parish Councils

- Scope of policy limited to new developments - how will infrastructure be provided for existing residential and commercial premises?
- Consider how this may be accomplished in existing dwellings - When considering new applications from existing households perhaps?
- What consideration has been given to driverless vehicle technology?
- Also consider battery swapping and fuel cell vehicles.
- Possibility of other sustainable energy sources such as Hydrogen Cells coming into the market.
- The rollout of electric vehicles requires adequate charging points in public areas as well as on new developments.
- Consideration should be given to the payment arrangements for the service.

Historic England

- If COM9 applies to existing buildings, then there should be additional supporting text to address the issue of harm to heritage assets.

Community groups

- Consider scenarios where autonomous vehicles become widely available - Plan should be flexible enough to accommodate radical uncertainties.
- Chargers need to be able to use credit/debit card to pay without needing to be part of a club etc.
- Cycle parks at railway stations should have charge points too, with secure storage while charging.
- Residential charge points can be the type where the car battery can put power back into the grid when needed.
- Solar car ports should be installed in car parks.
- More EV charging points should be provided, with community car-sharing schemes and bike/e-bike hire especially at rural transport hubs.
- Spaces for car clubs should have fast charging points due to increased use of the cars.

Developers/Landowners/Agents

- Does not consider hydrogen vehicles or alternative fuels which might be appropriate for goods vehicles. There needs to be a range of 'alternative' fuelling facilities strategically located on strategic routes with adequate amenity and rest provision.
- Recent changes to building regulations that require EV charging points means that the Council's policy approach is unnecessary.
- The development of a network of electric fuelling stations and the availability of communal fast charging points may be part of overall provision, either on or close to sites.

Public response

- Spaces for car clubs should have fast charging points due to increased use of the cars.
- Create community charging points in villages where access to personal off-road charging is not universal - could link to local renewable generation plans.
- Radical new policy needed allowing existing older vehicles to be converted to electric in local industries and reducing manufacturing environmental damage caused by the car.
- Need for electric/non-electric cycle parking in all new developments.
- Number of electric charge points should be increased during the summer due to tourists.
- Restrict new petrol refuelling sites / support the adaptation of existing petrol stations to EVs.
- Need fair distribution of charge points to minimise discriminatory impact on house prices and so does not end up with segregation of charging points.
- Needs to be part of an overall transport policy to reduce car use, encourage car sharing and alternatives like cycling and walking.
- Lack of mention of autonomous vehicles and 5G communications.
- No mention of the impact of autonomous vehicles providing elderly people with the ability to live in villages but still able to access towns.
- Car parks should have rapid charging points.
- Important that there are sufficient public charging points for those unable to charge at home.
- Residents/employers (not developers) should be responsible for installing EV charging points.

Grid capacity

Town and Parish Councils

- Concern that the grid cannot provide enough electricity to charge all electric vehicles.

Community groups

- Need to consider batteries becoming part of balancing required for stability of the grid.

Developers/Landowners/Agents

- In some instances, the site-specific infrastructure available for a development simply cannot support high levels of EV charging.
- It is important that infrastructure is in place to provide the opportunity to make charging connections.

Public response

- What energy source will provide the electricity? Doubt that renewables will be that source.
- Sufficient infrastructure to support this objective is key.
- There is no projection of the impact of EVs on grid capacity.

10.2. Policy

Policy approach

Town and Parish Councils

- Approach is essential to meet low carbon targets.
- The Policy should be more prominent and placed at beginning of section 6.

Environment Agency

- Support this section/policy to provide infrastructure for electric and other low emission vehicles.

Dorset County Hospital - NHS trust

- Support for EV charging infrastructure.

Community groups

- Agree with approach - assuming it is effective from the date the plan is made.

Developers/Landowners/Agents

- The provision of infrastructure for electric and other low emission vehicles is supported.
- Technology changing fast; provision should be based on case-specific circumstances and by reference to overall development viability.
- COM9 is supported, subject to being able to comment on the detail of this policy and any background technical and feasibility / viability evidence.
- Requirements should be subject to viability.
- It is unclear whether the term 'infrastructure' includes the provision of substations.
- Amend policy to allow flexibility should cost of electricity grid upgrades increase in future.
- Only considers charging points in new developments and not towns etc.
- Support given the requirement for a zero-carbon future. However, the policy needs to be flexible to take account of site circumstances, changes in technology and the capacity of the grid.
- Amend policy to reduce the detail included - Provision should instead be required at a level which is achievable based on the proposal and uses.
- EV charging points should be assessed for appropriateness on a case-by-case basis, and subject to development viability and assessed demand for such provision - wording should be added to sub-headings I, II and IV.

Public response

- There should be provision for electric charging at all new parking spaces.
- Developer should explain why they can't provide 100% and negotiate how much they can provide.
- Suggest extending to existing developments / make available to all, not just residents only.
- Details are vague and seem to indicate charging stations rather than giving each house own charging point - must be made a condition of developers being awarded contracts.
- Support - required to remove obstacles on the demand side.
- Agreement with approach - as long as they are maintained and accessible.
- Agree - need to bear in mind many houses have more than one car.
- Disagree – EVs take a lot of resources to make them - they are just greenwashing.
- Disagree - another subsidy for motorists. A multitude of electric buses would be beneficial.
- This should be a requirement until there is a common charging unit that fits all cars.
- The requirement to deliver new charging points for electric vehicles should be assessed on a case by case basis (taking account of development viability) – the respondent suggests that the terms of the policy (specifically criterion I, II and IV) should be revised to reflect this position.

Criterion I.

Sport England

- All new developments where practical should include charging points.

Southern Western Railway

- The number of charging points in any expansion of car parks at rail stations may need to be flexibly applied to avoid a shortage of standard spaces until there is sufficient demand for EVs.

Community groups

- Future developments should have a good amount of charging points for vehicles. There also needs to be provision in public parking areas.
- There should be provision for electric charging at all new parking spaces.
- EV charging points should be essential in any new build.
- EV provision needs to be strengthened - the number of spaces for EVs needs to be increased.
- The phrase “will be expected to” should be replaced by the word “must” to strengthen policy.

Public response

- Needs strengthening to say all new developments are 'required' to have.
- Targets are unambitious given this plan is supposed to be current up to 2038 when electric cars will be universal.

Criteria II - V - Residential development

Town and Parish Councils

- Every new house should have an electric charging point installed during the building stage, as well as sufficient public charging points.
- 20% requirement for active charging facilities seems too low, unlikely to deliver adequate capacity for post carbon transport infrastructure.
- How was 20% target determined?
- 20% target will be inadequate later in the plan period (to 2038).
- Part II. ‘will be expected to’ should be changed to “must”.
- Given the national commitment to move to electric vehicles this number appears insufficient. Does it enable 100% of vehicles to be electrically charged in 2050? If not, it needs to be strengthened to ensure this is the case.
- The targets for providing active charging facilities for large developments should be a much larger proportion than proposed, at least 80% - this policy will have to be reviewed soon to keep pace with technological changes and the changing strategies needed to address climate change.

Community groups

- Concern that a 20% requirement may be inadequate later in the plan period. The conflict between viability and the potential loss of additional affordable housing is understood.
- Should be an ambition for EV charging points in all new dwellings where planning applications indicate a parking provision.
- Concern that for residential development, the current wording will result in few parking spaces with even fewer active charging points leading to considerable stress in the community.
- Every household should have access to 1 parking space with an active charging point whatever the size of the development - should allow (at minimum) full charging overnight (8 hours).

Developers/Landowners/Agents

- Concern about the prescriptive targets for active provision and rapid charging for residential development.
- The provision of active spaces within a residential development needs to be agreed in consultation with future occupiers, to ensure charging points are readily available for those who

are seeking one. By stipulating a blanket 20% provision requirement, it will result in charging points being installed where they may not be used.

- Concern regarding providing active points up front, as technology may not be compatible with user requirements. It is important that the policy remains flexible to respond to emerging technology, as a rigid approach can become quickly out of date.
- Recommend that the total requirement for active charging points is removed or reduced to around 5%, with the potential for this to increase in capacity, subject to future demand and to allow customer choice. This is an item that could be monitored as part of travel plan measures, in parallel to the provision of other active travel measures, over the build out and occupation of a development.
- Clarity needed in sub-heading II over what active and passive charging facilities are. Policy should allow flexibility as new technologies and electric charging connections emerge.

Public response

- 20% of spaces with charging points is likely to be an underestimate of what is needed.
- Active charging points should be provided in all new developments irrespective of the numbers of dwellings in the development.
- The policy should provide further clarity around the definition of passive and active charging facilities, and the policy drafting should allow for greater flexibility.

Criteria VI - VIII - Non-residential developments

Town and Parish Councils

- Non-residential development - the requirement should support 100% of vehicles being able to recharge when present on the site. 20% seems low.

Community groups

- For non-residential development all parking spaces should provide basic charging facilities.

The Grove Medical Centre

- Some facilities e.g. GP surgery parking, length of visit not long enough to warrant 20% of spaces being electric charging points - so suggest some flexibility based on development.

Public response

- Part vii - policy should be amended so the requirements are based upon any new parking spaces delivered, rather than the overall total - example of Bourne Leisure's existing sites and unfeasibility of achieving policy goals as part of modest proposals for additional units.
- Active charging points should be provided in all new non-residential developments.
- Hospitality should be able to have charging points for their customers' use as part of the terms and condition of rentals.
- Given the reliance on tourism / visitors there should be greater provision for rapid charging points in the tourist areas.

Additional criteria

Historic England

- Suggest a new policy criterion: 'Provision of infrastructure for electric and other low emission vehicles should be sited to conserve the significance, including the setting, of any heritage asset.'

Developers/Landowners/Agents

- A mechanism should be inserted into each policy to allow requirements to be relaxed where they would threaten viability and/or deliverability.

Public response

- Charging in Victorian streets with parking on both sides and no guarantee of parking near house needs to be addressed as well as needs of new developments.
- Charging points need to be located where people with disabilities can easily access them.
- The policy should mention fast charging points, which is key to increasing EV use.

11. Policy COM10: Low carbon, decentralised and renewable energy schemes

11.1. Approach

Overall approach

Natural England

- Supports the policy, subject to amendments.

Environment Agency

- Support this section and policy for low carbon and renewable energy development.

Woodland Trust

- Welcome policies to support renewable energy.

Town and Parish Councils

- Support for the policy and approach.
- Dorset Council Local Plan should include positive targets to support objectives in the climate change emergency.
- Considers that this section of the local plan should cross reference the housing/design chapters and introduce requirements for sustainable construction/design.
- Considers that the council should put equal emphasis on design/technologies which lead to a reduction in energy consumption.
- Suggestion that we should be maximising the benefits from our geographical location in terms of renewable energy generation.
- There should also cross referencing to DEFRA and other government agencies advise on suitable sites.
- Concern that the policy is contradictory, in that it starts by encouraging low carbon and renewable energy development, and then applies restrictions on their delivery.
- Bridport Area Neighbourhood Plan has various policies and projects relating to renewable energy sources.

Other local groups

- General agreement with the policy and approach.
- Have been cases where Local Authorities have supported initiatives only to subsequently find they have wasted taxpayers' funds on failed "Green" businesses.

- Reference to the government energy white paper.

Local environmental groups (non-statutory)

- Need for an ambitious approach to the production of renewable energy, and phasing out of fossil fuel production in Dorset.
- For new developments of significant size, need to explore the potential for community-wide heating and energy generation, in preference to separate installation on each dwelling or other building.
- Section should state far more vigorously the central role of renewable energy in the future energy supplies of the County.
- Reference to the Climate Emergency Strategy on phasing out fossil fuels and switching all uses of energy to renewable sources – this should be reflected in the policy.
- Predictable total need for Dorset County and the BPC conurbation is about 8 GW, 16 times the current total.
- Prediction of high potential for production of solar power on the roofs of existing and new buildings, ground-source and air-source heat pumps, community energy schemes, and hydrogen/nitrogen power.
- Support development which generates sustainable energy.
- Decisions relating to the use of land to generate renewable energy should take account of agricultural uses and the need for food security.
- Council/local plan policies should support development which explores other means of generating renewable energy including marine source heat pumps or sea bed tidal power.
- Policy does not appear to reference carbon capture and storage or the potential negative effects connected with bioenergy crops (including damage to existing habitat and ecology).
- Council should have regard to the refresh of the national Bioenergy Strategy before developing on its own bioenergy strategy.

Developers/Landowners/Agents

- Agreement with the approach and wording.
- Support for the policy and approach, subject to being able to comment on the detail of this policy and any background technical and feasibility / viability evidence.
- Importance of underpinning of the policy by viability evidence.

Public response

- General agreement with the importance of renewable energy development in tackling climate change.
- Concern that the plan imposes many more conditions on the development of wind and solar farms than on fossil fuel extraction facilities.
- Concern that the policy reads as if permission for renewable energy is a last resort - inconsistent with climate emergency.
- Should include figure of hectares of land required per megawatt of generation capacity and expected load factor for prospective developments to increase future discussion.
- The need for electricity will soar with electric vehicles and phasing out of gas boilers for heating.
- Support for necessary temporary rural energy sites - could give some limited life licenses for 10 years to allow technologies to develop and can then be replaced.
- Consider collaboration programmes to finance green technologies.
- Overall, the approach to renewable energy is less than positive at a time when we need to maximise energy efficiency and still deal with the energy needs that remain without fossil fuels.

- Urge a more vigorous and adventurous approach be taken to increasing the amount of renewable energy generation.
- Greater weight should be attached to the generation of renewable energy when assessing the merits of development generating renewable energy.
- The scope of Policy COM10 should be widened to include references to large scale wind development.
- Local plan policies should encourage community led renewable energy development, but not impose a requirement for renewable energy development to be community led.
- Local plan policy should encourage other means for generating renewable energy to be developed, at the same time as preserving the countryside.
- Is there any possibility to cooperate with other neighbouring authorities to reach agreement/common ground with the distribution of the plan's unmet housing and other needs such as renewables.
- The need for development renewable energy should be balanced against other considerations including other leisure and recreational uses.

Paragraph 6.8.1 & footnote 4

Town and Parish Councils

- Paragraph 6.8.1 refers to the EU Renewable Energy Directive. Does this directive still have any legal standing in the UK?

Other local groups

- Objection to Footnote 4, due to confusing the public expectation of renewable energy and suggested replacement - 'Renewable fuels are listed in the Renewable Energy Directive as wind, solar, hydro energy; energy arising from the burning of plant and animal matter (known as bio energy); waste energy (e.g. landfill gas); and aerothermal, geothermal and hydrothermal energy (heat derived from the air, ground and water) and renewable energy is not that which is obtained from burning plastics or fossil fuel derivatives.'

Public response

- Footnote 4 should be clear: renewable energy is not that which is obtained from burning plastics or fossil fuel derivatives.
- Policy should state what types of renewable energy schemes will be considered in support of Climate Change targets - provide clarity on direction and not hidden in a footnote (4) as currently depicted.

Paragraph 6.8.5

Town and Parish Councils

- Concerned that the wording in paragraph 6.8.5 states that an Environment Impact Assessment (EIA) are only "likely" to be required - all developments of this type must have an EIA.

RSPB

- Para 6.8.5 - welcome recognition of the need to ensure the impacts of non-renewable developments are considered - impacts on sensitive NSN sites and priority species should be highlighted as key areas of concern.

Paragraph 6.8.6 - Small-scale

RSPB

- Even small-scale renewable developments (para 6.8.6) need to be sited away from sensitive sites, and it cannot be assumed that small-scale proposals will not be harmful if poorly sited.

Town and Parish Councils

- Considers that smaller scale renewable energy development would be better received.

Paragraph 6.8.7 - Energy crops

Natural England

- Concerned that the potential use of energy crops is included by the local plan as part of a low carbon strategy.
- Expansion of maize growing in particular can have detrimental consequences for both soils and the aquatic environment, including increasing diffuse nutrient pollution that may harm the National Site Network, as well as other important wildlife interests.
- Worth noting that elevated nutrients in coastal waters has been linked to the loss and degradation of saltmarsh and seagrass beds, both of which are important carbon stores, as well as important wildlife habitats.
- Recommend that the reference to energy crops is deleted, or heavily caveated to ensure that only those proposals that can demonstrate genuine sustainability against a broad range of criteria are included.

Local environmental groups (non-statutory)

- Paragraph 6.8.7 Oppose the use of bioenergy crops specifically to produce energy, though support biomass energy from waste materials.
- Disagreement with the suggested wording – paragraph 6.8.7, there is growing evidence that energy crops can lead to harmful environmental change by driving conversion of land to growing energy crops and some of these can have detrimental ecological impacts - For example a number of important neutral grassland habitats have been lost to conversion to maize crops for energy in recent years.
- Maize is also a crop which tends, unless very well mitigated, to lead to run-off of soil, nutrients and pesticides, affecting water quality and further reducing biodiversity (and leading to loss of soil carbon, ironically) - is not appropriate for development to fund this type of potentially damaging energy crop.

Public response

- Objection to use of land for energy crops - need a massive increase in tree planting to sequester carbon and have a food security issue - farmers being diverted to make cash crops to burn is unacceptable.

Habitat impacts

RSPB

- Policy COM10 - does not provide adequate safeguard for important NSN sites and species.
- The test for renewable developments in relation to these sites and species are set out in ENV2 and this should be referred to in the policy.

- The test for adversity should be stated as in ENV2, ie. development should not be allowed unless it meets all the tests set out in the Habitats Regulations.

Public response

- Wind turbines do result in many bat and bird deaths, RSPB gives guidance on positioning to help minimise casualties.

AONB & Landscape impacts

Cranborne Chase AONB Team

- Concern with impact of solar panels on the landscape – do not merge into the landscape and are incongruous intrusions into verdant and wooded hillsides.
- Visual impact of solar farms close up, and impacts of equipment and buildings.
- The AONB has produced position statements on both Renewable Energy and Field Scale Photovoltaic Panels.

Local environmental groups (non-statutory)

- Renewable energy should be given higher importance in decisions about land-based installations – including in relation to landscape and heritage impacts of solar and wind energy development.

Town and Parish Councils

- This policy does not seem to address the impact of solar farms in the AONB and other sensitive areas - solar farms in these locations should be resisted.
- Considers that renewable energy development should be clustered to avoid wider landscape impacts.
- Sites for the proposed generation of solar renewable energy would blight the Jurassic Coast and the AONB.
- Concerned that the policies proposed may not be effective on protecting the landscape character and rural amenity of the countryside.

Public response

- Nimbyism, heritage and landscape concerns should not be given more weight than potential climate benefits when considering sustainable energy schemes.
- More impact on landscapes and heritage may have to be accepted given the urgency of climate change.
- Wind turbines have a small footprint, landscape can be returned to normal after 25 years - a medium term solution.
- The policy should recognise that landscapes can change to meet new pressing societal demands.
- There may need to be a need to acknowledge that landscape impacts will arise due to the for the provision of renewable energy infrastructure - suggestion of amended wording.

Loss of Agricultural land

Cranborne Chase AONB Team

- Concern with solar farms taking land out of agricultural production and, in the interests of supporting effective local food production, solar panels should not be allowed on grade 3A, grade 2 or grade 1 agricultural land.

Town and Parish Councils

- Concern with loss of Grade A agricultural land.

Heritage impact

Town and Parish Councils

- Suggestion that heritage considerations are given priority over the climate emergency.

Public response

- The proposal that ‘renewable development be allowed only ‘if it causes little harm to the significance of a heritage asset’ could imply blocking any wind turbine that can be seen from any point in a SSSI.

Embedded energy

Town and Parish Councils

- Lack of reference to adverse eco-effects of wind turbines and solar energy, such as mining and use of fossil fuels required in the manufacture of batteries and the manufacture and installation of wind turbines.

Solar Farms

Town and Parish Councils

- Concern with concentrating on solar farms when there are many other sources of renewable energy.

Local environmental groups (non-statutory)

- Solar farms should also be encouraged.

On-shore wind farms

Local environmental groups (non-statutory)

- Viewed through the lens of the Climate and Emergency Strategy the Local Plan should actively support on-shore turbines large and small.

Public response

- Plan should actively support sites for on-shore wind farms and allow further sites to come forward - balance should shift in favour of low carbon developments.
- If residents want everything electric, then they must accept wind farms.
- Onshore wind and solar are cheapest ways of generating renewable energy and need to keep costs down.

Off-shore wind farms

Local environmental groups (non-statutory)

- Offshore windfarm would not be visually destructive and would provide energy for all of Dorset.
- The World Heritage coast and its fossil record would not be greatly impacted by an offshore wind farm 10- 20 miles from the coast.

Community led energy schemes

Town and Parish Councils

- Suggestion that all policies for renewable energy should consider flexibility where there is community acceptance.

Local environmental groups (non-statutory)

- Power sources for community energy schemes may include solar farms, small to medium scale wind turbines, geothermal energy and micro-hydro power.
- Any excess heat or electricity would be sold to the grid or other local users.
- Need for sensitive design of community energy schemes.
- Plan should emphasise the potential for area- or street-based activity such as solar streets or community energy schemes.

Parish and Local environmental groups (non-statutory)

- Support for the principle, stated in the Plan, that renewable energy projects are more likely to gain public support if there is community ownership of, or direct local benefit from, the installations. We are in favour of community energy projects, and would wish to see weight given to such projects in the process of planning control.

Public response

- Any proposals should be community led with parish and town councils involved.
- Request for stronger emphasis on supporting community initiatives.
- Local generation of electricity needs to be implemented and local generation and distribution infrastructure needs to be enhanced at a very much faster rate than imagined in this plan.
- Need a map of potential renewable energy schemes - give communities option to buy a share in local renewable projects e.g. solar farms.
- New housing (and industrial) estates for in excess of 50 residents (or jobs) should be provided with communitywide renewable energy and heat generation, of in excess of in preference to providing the infrastructure for these for each dwelling.
- Community-led projects should be particularly encouraged but being community led should not be a condition for approval.

On-site renewable energy

Town and Parish Councils

- There should be a policy to encourage better utilisation of roof space and orientation of buildings for PV installations, particularly on industrial developments.

Local environmental groups (non-statutory)

- Should require all new houses to be carbon neutral using heat pumps, solar panels, 12 volt low power systems, community district heating schemes.
- Prediction of high potential for production of solar power on the roofs of existing and new buildings, ground-source and air-source heat pumps, community energy schemes, and hydrogen/nitrogen power.
- Plan should emphasise the potential for area- or street-based activity such as solar streets or community energy schemes.
- Solar PV arrays should be encouraged on farm buildings, car parks, domestic and commercial roofs, schools and leisure facilities.

Public response

- On site renewable energy should be made an explicit and stated preference.
- All new housing should have central reservoir for run-off water from gutters and eaves to reduce water consumption and energy required to pump clean water.

- All new houses should include energy production and storage as a key component - e.g. all new houses to have solar panels on roof so orientation and connection to grid are key components to approval.
- All new housing should include ground sourced heating - retrieved from sewers where fluid would be over 60 degrees.
- Solar PV arrays on farm buildings, domestic and commercial roofs and solar farms should be encouraged in the Plan.
- Need to create self-sufficiency in terms of renewable energy generation.
- Alongside these developments, need to now require the addition use of large open spaces to contribute towards environmental power generation.
- New houses should all have chemical storage.
- Large developments should have dedicated solar/wind generation areas.

Retrofitting

Local environmental groups (non-statutory)

- Retrofitting existing buildings should be made easier.
- Need for a programme of updating the energy efficiency of dwellings throughout the county - Plan should provide for a supportive and flexible approach to this.
- No framework for requiring households to work towards carbon neutrality, decreasing energy use or solar power sources.

Public response

- The plan should seek alternative ways of seeking carbon reduction such as retrofitting homes and insisting on sustainable new build; rewilding; public transport improvements etc.
- Solar PV arrays on farm buildings, domestic and commercial roofs and solar farms should be encouraged in the Plan.

Other sources of renewable energy

Chideock Parish Council

- Lack of mention of clean; efficient and reliable capability of “Nuclear Power” - necessarily a new Nuclear Power Plant within West Dorset but at least acknowledgement of the benefits to the National Grid.
- Lack of reference to alternative energy sources arising from harnessing tidal energy or the use of an “Archimedes’ screw” within the abundant river courses within West Dorset.
- Lack of mention of hydrogen cell technology.

Local environmental groups (non-statutory)

- The plan should also encourage other forms of renewable energy including micro-hydro electric and geothermal.
- Climate change contributions from development would be much better targeted at permanent land use change that captures carbon, such as wetlands or native woodlands.
- Want to see more support for sustainable timber – multiple benefits in terms of woodland creation, energy performance of housing, and economic benefits.

Public response

- The plan should encourage other forms of renewable energy including micro-hydroelectric, geothermal and Carbon Capture and Storage (CCS) as long-term solutions.

- Wood fuel and timber supplies continue to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management. Locally sourced wood in construction and as a sustainable, carbon lean fuel.
- Hydrogen should be added to the list including heat and electricity.
- Portland Port needs to innovate and use marine / tidal resources and cut down on endless haulage truck movements.
- Dorset Council should employ a strict enforcement of only biogenic energy for Dorset Zero Carbon future.

Waste incinerators

Local environmental groups (non-statutory)

- Opposition to the incineration of waste - should not be seen as a source of renewable energy due to involvement of plastics, and levels of carbon dioxide and pollutants produced in the process.
- Concern that waste incinerators create a long-lasting demand for waste.
- Opposition to the waste incinerator proposal at Portland.

Public response

- Energy from residual waste in particular should not be classified as renewable – reference to the EU directive.
- Concern with the proposals for a waste incinerator on Portland.
- A more sustainable, if controversial, technology is the use of clean waste incineration to generate power.

Non-renewable energy sources (Fossil Fuels)

Parish and Local environmental groups (non-statutory)

- Wytch Farm should not be allowed to extend its drilling for oil, and should be encouraged to switch to extracting geothermal energy from the water in its spent oil wells.
- Plan should make plain the Council's opposition to new or expanded extraction of fossil fuel within the County – e.g. at Puddletown and Wytch Farm.
- Need to phase out fossil fuels.

Public response

- The proposed extensions of Wytch Farm and drilling in Puddletown are incompatible with Dorset's aim of carbon zero.
- All new applications requiring burning of fossil fuels such as in energy from waste plant should be prohibited - no new applications will be permitted including burning of plastics of mixed media products.
- The Plan should include a strategic policy statement opposing the further development of hydrocarbon resources which is then detailed in any new Minerals Plan.
- The Plan includes nothing on fossil fuel developments - should include a strategic policy statement explicitly opposing the expansion of extraction, refinement, transport and sale.
- Plan should make plain the Council's opposition to new or expanded extraction of fossil fuel within the County - including opposition to any new exploration or extraction, by fracking or other means, of oil or gas.

11.2. Policy

Balance in decision making

Town and Parish Councils

- When trying to achieve no harm or minimal harm there should be a presumption in favour of renewable energy sources.
- Query is there a clear definition of what a substantial harm might be?

Cranborne Chase AONB Team

- Wording is too permissive for applications within this AONB or its setting.
- Wording as currently set out seems to rely too much on subjective judgement in relation to the impacts, harm, and benefits.

Local environmental groups (non-statutory)

- Concern that the policy requires a burden of proof - permission should be given unless it can be shown that there are material effects of the kinds described that amount to harm that might be created by the development.

Public response

- The balance of decision making should shift in favour of low carbon developments.
- Suggestion that developments may well have some impacts, but such effects will be inevitable to assist a transition to a low carbon economy.
- A renewable energy development should be measured by its contribution towards net zero and any collateral harm should be minimised.
- Individual farms and scattered residencies can often suffer serious impacts from both wind and solar developments.
- Whilst protection of the environment is important, and covered elsewhere, there should be an ambition to achieve a position where the presumption is in favour of renewable energy sources.
- Criteria should strike a realistic modern balance between the high need to tackle climate change by reducing greenhouse gases and the need to protect the county's landscape.
- Disagree with suggested wording for the following reasons - needs to address the balance between competing policy objectives (e.g. those relating to the Area of Outstanding Natural Beauty), not clearly drafted (too much uncertainty).

Why has 'large scale wind energy' been excluded?

Local environmental groups (non-statutory)

- Policy stated at COM10 should be modified to include (rather than exclude) large scale wind energy, and should recognise that landscapes can change to meet new pressing societal demands.

Public response

- No explanation in 6.8.1 of the reason for 'other than large scale wind energy' being included and should be explained or omitted.
- The policy stated at COM10 should be modified to include (rather than exclude) large scale wind energy.

Why has 'small scale wind energy' been included?

Local environmental groups (non-statutory)

- Small scale wind turbines should be included in COM10; there should not be a separate policy making it more difficult to install small scale wind turbines than other forms of renewable energy.

Public response

- Policy seems to include small scale wind - at odds with existence of COM11 - could be made clearer.

Criterion I - Introduction

Town and Parish Councils

- Suggestion that the wording 'will be allowed' should be changed to 'will be encouraged'.

Cranborne Chase AONB Team

- Strongly advises that the second line of the policy is amended to take out 'wherever possible' and changes 'will' to 'should' as well as incorporating the comments made above.

Criterion I - Bullet point 1

Natural England

- Policy COM10 – the first bullet should include reference to the protected landscapes of the AONBs. We suggest this is achieved by adding a further sentence, "Within AONBs schemes will only be permitted where their scale and setting ensures they do not conflict with and contribute towards the aims and objectives of the relevant AONB Management Plan."

Criterion I - Bullet point 2

Public response

- Policy COM10 - Object to the inclusion of flicker in second point of the policy - has not been proven and therefore should not be included.
- What constitutes as 'minimising' can significantly vary and this test does not require an applicant to mitigate adverse impacts - suggestion that the policy is amended to be more precise.
- Considers that the policy should ensure that no unacceptable adverse impact on residential amenity is created as a result of low carbon energy development, rather than proposals simply minimising the harm.
- The plan needs to consider ways that neighbouring property suffering negative impacts can be compensated so as to ensure that the cost of reaching a carbon neutral or carbon negative position is met in a fair and equal way across the community.
- Policy should provide adequate amenity protection for other sensitive uses, including visitor accommodation, camping and caravan sites, against adverse impacts of low carbon development - concerns with loss of visitor expenditure as a result of impacts.

Criterion I - Bullet point 3

Natural England

- Policy COM10 - The third bullet does not provide adequate protection to wildlife interests as it fails to apply the mitigation hierarchy, nor does it reflect the need for renewables to also

contribute to addressing the ecological emergency declared by the Council. The bullet should be reworded to, “adverse impacts upon designated wildlife sites including local sites, or priority habitats and species must be avoided, elsewhere where impact to wildlife interests are unavoidable, developers must provide mitigation or, as a last resort, compensation. All schemes must meet the requirement for biodiversity net gain as set out in policy ENV3.”.

Local environmental groups (non-statutory)

- Agreement in principle, however care is needed to avoid inadvertently supporting harmful and counter-productive developments – for example for solar power, which is proposed in inappropriate locations where priority habitat would be harmed.
- Policy COM10 fails to properly reflect the full avoid, reduce, mitigate, compensate hierarchy and neither does it seek net biodiversity gain and therefore it should be re-worded:
 - adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are avoided, residual impacts satisfactorily mitigated and net gain for biodiversity achieved as with all developments.

Woodland Trust

- Developments should not be sited to adversely impact on important ecology, and wording should be strengthened: ‘sites should be first avoided, and otherwise satisfactorily mitigated. Proposals that adversely impact on protected sites, irreplaceable habitats and the integrity of ecological networks are not permitted’.

Criterion I - Bullet point 4

Historic England

- Policy COM10, criteria I should be reworded to not imply that less than substantial harm to designated heritage assets will be acceptable.

Town and Parish Councils

- Policy COM10 final bullet - ‘less than substantial’ should be quantified for avoidance of doubt.

Other local groups

- Policy COM10 – suggestion that Public rights of way should be included in the 4th bullet point.

Additional criteria

Town and Parish Councils

- Considers that the policy/supporting text should refer to clear targets.
- Suggestion that the policy should be rewritten to sound more positive and constructive.
- On-site renewable energy should be the explicitly stated preference.

Local environmental groups (non-statutory)

- Suggest that the Local Plan should be filled out to include a clear statement of the criteria that the Council will apply in assessing proposals for renewable energy installations anywhere in the County.

Public response

- The policy should also address energy storage development, unclear drafting is likely to discourage development.

Identify sites

Town and Parish Councils

- Considers that this section of the local plan should outline projects.

Public response

- Should identify sites with potential for solar arrays or micro hydro-electricity schemes.
- There is no list of renewable energy sites and their capacity.

12. Largescale Wind Energy

12.1. Approach

Overall Approach

Natural England

- Would also note that field scale solar development, or indeed other types of development including new road and non-renewable energy schemes, can be equally contentious, but are not similarly restricted.

Environment Agency

- Support renewable energy proposals that are located in an appropriate place.

RSPB

- Objection to the absence of a policy for major wind farm developments and lack of explanation.

Imerys Minerals

- Current land uses and underlying geology should be taken into consideration when identifying opportunities for larger scale wind development. (The council appears to be considering the opportunity for larger scale wind development on a site actively worked for minerals - the western extension at Trigon Ball Clay Quarry – which should be safeguarded for the current use).

Environmental groups (non-statutory)

- Support both onshore and offshore wind energy development. We badly need more wind energy to slow global heating.
- Concern that there is no policy covering major wind farm development, which is confusing – need for a policy setting out the necessary requirements for large scale wind development.
- The Council took into account renewable energy generated by installations of National Significance when, in March 2012, it set its local 2020 renewable energy targets - consultation documentation is not clear that this policy remains in place – suggested that it can have an influence on local targets.
- Dorset has plenty of local resources to produce its own energy.
- Dorset and BCP as an area needs to do everything possible to become self-sufficient in renewable energy.
- Wind energy is the only solution to making Dorset and BCP self-sufficient in renewable energy.
- Local plan policies should increase the weight attached to development providing low carbon energy when considerations are balanced through planning decisions.

- The local plan should include policies which support large scale wind turbines in Wareham Forest.

Community groups (non-statutory)

- Schemes should be financially viable together with proven energy efficiency.
- Reference to government energy white paper.
- Whilst protection of the environment is important, and covered elsewhere, there should be an ambition to achieve a position where the presumption is in favour of renewable energy sources.
- Should be maximising the benefits on offer from our geographical location.

Town and Parish Councils

- Strongly supports wind farms as a vital contribution to the fight against the climate crisis.
- Considers that tests for exceptional circumstances would always be met through the climate crisis.
- Wind turbines could provide a quicker interim route for an agreed period of time.
- When trying to achieve no harm or minimal harm there should be a presumption in favour of renewable energy sources.
- Concerns over large scale turbines due to the visual intrusion.
- Reference to a recent planning application for wind turbines on this site (Slyers Lane) that was rejected.
- Generally the communities that are being asked to accept the intrusiveness of wind farms do not need the capacity being generated.
- The need for decarbonizing Dorset's energy requirements cannot be met only by onshore wind turbines or PV arrays.
- Land is much needed in Dorset for farming, amenity, health & wellbeing, landscape, biodiversity and the important tourism industry.

Public response

- Importance of on-shore and off-shore wind energy in tackling climate change.
- Needs to clarify whether or not wind energy sites have been identified in West Dorset.
- The alternative to 450 large wind turbines would be a need for 12,000 acres of solar farms.
- Would be outsourcing energy use impacts if we didn't have wind turbines in Dorset .
- Need for a mix of wind and solar.
- This draft of the Plan imposes many more conditions on the development of wind and solar farms than on fossil fuel extraction facilities.
- Each application should be decided on its merits.
- Wind turbines should be small only - not near the Dorset Ridgeway.
- Since wind turbines are good for the environment there should be no objection.
- Support for wind turbines providing the value to the grid outweighs the environmental cost of its construction and installation.
- Importance of increasing wind green energy, mitigating climate change should outweigh other considerations.
- The balance of decision should shift in favour of low carbon developments.
- Onshore wind is the quickest and most economical way to generate excess renewable energy.
- Would suggest that visible, large, onshore wind turbines are a necessity.
- Demands on cables being buried on the ridgeway would be helpful for future increases in electrical energy need due to electric vehicles, heat pumps etc.
- Respondent considers that wind farms could be a central pillar of a 'Green Economy'.

- Farming could continue next to turbines.
- Emphasises the efficiency of wind energy development.
- Suggestion of co-designing wind farms with a large sculpture nature park - encouraging diversity and a leading edge feature that would attract business and wildlife.
- Some opposition to wind energy development in rural Dorset.
- Suggestion to abandon the idea of onshore wind turbines in Dorset.
- Onshore wind represents the cheapest electricity source, even without subsidies, and is most productive at the time of year when we require the most energy.
- Onshore wind is not the right way to generate power.
- Onshore wind profiles for Dorset do not support effective production of electric power.
- Instead of blotting the landscape with large scale wind farms, place a turbine on every lamp post and incentivise householders to place one where their TV aerial used to be.
- Query the benefits of on shore wind farms against offshore or solar power with battery technology.
- It would be more sustainable, efficient and cost beneficial to equip all technically feasible existing roof tops with solar panels before taking up large areas of valuable rural land with wind and solar panel farms.
- Concern with the scale of turbines.
- Concern that associated infrastructure will be difficult to eradicate.
- The criteria used to decide whether a wind farm is permitted need be made explicit.

Definition of large scale wind

Natural England

- Clarification is also needed in this section on what scale (i.e. number and height of turbines) will be considered large scale and therefore not covered by policy COM11.

Local environmental groups (non-statutory)

- Paragraph 6.9.3 - need for a definition of “large scale” wind projects, to know minimum height of turbines.

Dorset AONB Team

- Requires definition of large scale wind energy projects - difficult to adequately envisage implications - could provide medium height of turbines.

Public response

- 'Large scale wind energy' requires definition in the plan.

Paragraph 6.9.1

Natural England

- Paragraph 6.9.1 - Clarification is needed here that the supporting text refers only to large scale wind energy development, as otherwise the suggested wording gives local communities a veto on all wind energy development, no matter what the scale.

RSPB

- Paragraph 6.9.1 - not appropriate for wind energy development to be determined through neighbourhood plans - Siting of wind turbines should be determined at a strategic level within this plan.

Paragraph 6.9.2

Public response

- Benefit of a feel good factor of knowing that a turbine is creating electricity, which we all need and use, without producing any greenhouse gases.
- More of the plan should be dedicated to this and other renewable energy with an aim to achieve net zero greenhouse gas emissions by 2050.

Paragraph 6.9.3

Natural England

- Paragraph 6.9.3 - No information has been provided to demonstrate how the environmental constraints have been considered when identifying the opportunity areas, nor are there any criteria for establishing those areas.

RSPB

- Object to wording in accompanying paragraphs 6.9.3 and 6.9.4, and fig 6.6.

Paragraph 6.9.4

Natural England

- Paragraph 6.9.4. - would welcome the opportunity to review the opportunity sites along with the criteria used to identify the sites with your authority with a view to developing an appropriate Large Scale Wind Energy Policy.

Local environmental groups (non-statutory)

- Paragraph 6.9.4 – Query the assessment of viable sites. A fundamental review of the areas proposed may be required. Concern that the plan may encourage applications in areas that may subsequently be considered unsuitable.

12.2. Q1. Do you support the principle of allocating any of the areas for wind turbines?

Figure 6.5 and 6.6: Wind development opportunities

Natural England

- Figures 6.5 and 6.6 include land where large scale wind energy development has been previously refused and where there are known significant wildlife conservation constraints – most notably around the Wareham Forest.

Historic England

- The methodology to assess wind development opportunities shown in Figures 6.5 and 6.6 is not robust. It is not clear which heritage assets have been taken into account. It does not provide an appropriate evidence base. An additional assessment is required to support any allocations.

Cranborne Chase AONB Team

- Does not support considering the allocation of any areas for wind turbines within Dorset as a useful exercise - conflicts with the fundamental thrust of protecting the environment.

- Figures 6.5 and 6.6 identify areas for wind turbines that have already failed to progress through the planning system.

RSPB

- In terms of identified potential sites, it is not clear what constitutes medium risk in the plan, or on what ecological grounds they were identified.
- Concerns about these locations, which present potentially serious impacts to heathland NSN sites and key species such as foraging nightjars and bats – object to their inclusion.
- Object to fig 6.5 - unable to assess the implications of any potential wind farms in the areas identified, pending further information.

Development industry

- Support for principle of making allocations.

Local community groups (non-statutory)

- Figure 6.6 shows the Slyers Lane area as suitable for wind energy. This site should be omitted as it is visible from Dorchester and would have an adverse visual impact on both the nearby AONB and that area to the south.

Local environmental groups (non-statutory)

- Urgent action is needed to fulfil the government requirement of allocating sites for large scale onshore wind energy.
- We should be putting large turbines on all the areas identified on the plan.
- Welcome the indication of areas that might be potentially suitable for larger scale wind energy development.
- Purbeck Energy Group would like to see large turbines on the areas identified in Wareham Forest.
- Dorset Wildlife Trust - Maps 6.5 and 6.6 are not helpful because they appear to favour wind turbine development in certain locations whilst the text notes “further detailed work would be necessary to support their allocation”.
- Dorset Wildlife Trust - Several locations identified as sites of ‘medium ecological risk’, are on heathland and former heathland sites (with extant heathland soils), including Wareham Forest and we support the RSPB’s concerns about these sites.
- Concern that the published sites represent a gross overestimate for Dorset’s ability to generate renewable electricity from large onshore wind turbines, due to lack of inclusion of local landscape constraints.
- Note that the areas mapped only cover parts of the county; and that they do not show sites with potential also for solar arrays or micro hydro-electricity schemes.
- Showing the locations on a map is not appropriate prior to this further work which should include biodiversity assessment against on-site ecology, ecological restoration opportunities that could either be realised alongside wind development and conversely that could be lost, as well as proximity to important flyways and bird foraging, nesting and migration areas.
- It is not sufficiently clear how landscape constraints have informed the potential sites, which are labelled as areas of lesser ‘ecological risk’.
- Suggest that the maps are deleted from the plan.

Town and Parish Councils

- Support for the allocation of sites for wind turbines.
- Disagreement with the allocation of sites for wind turbines.

- There is no clear buffer expressed for scheduled monuments (unlike the 3km buffer used for Grade I buildings).
- Desk-based constraints-based study appears inadequate given the previous experience of wind turbine planning applications.
- There is a notable bias towards recognising ecology constraints, over heritage.
- Given the emphasis on climate change solutions, there should be further mapping where other criteria are used, so communities can consider these options.

Public response

- General support the principle of allocating areas for wind turbines.
- Some comments not supporting the allocation of sites.
- Doesn't know locations but agrees with any renewable energy being promoted.
- All the sites should be allocated for turbines.
- More locations needed for them to make a significant contribution.
- Would not support the use of land in Wareham Forest for wind energy turbines.
- Support the development of wind turbines north of Charminster.
- Sites suggested north of Dorchester already rejected.
- Do not support using these maps as a way of allocating sites for wind developments although I probably support development at some of these sites.
- Support the principle of wind turbines provided they do not impact settlements and visual amenity.
- One area identified as medium ecological risk in Figure 6.6 is part of Trigon Ball Clay Quarry - benefits from mineral planning consent and is safeguarded.
- Maps of possible wind farm sites on p248-249 are highly restrictive and do not cover any sites in the western part of the County.
- Support for sites in medium-ecology risk areas in Wareham/Wareham forest.
- Concern that maps published in final plan will act as a magnet to developers before communities have had proper input.
- Surprising that areas that have had applications refused are included.
- Constraints are too narrow - should include Grade II and II* listed buildings.
- Should have buffer for AONB as views into and out of AONB are important.
- Restrictions on wind turbine development in the AONB is likely to make this form of development unviable.
- Should be constraint relating to cultural or landscape heritage - important due to Dorset's reliance on tourism.
- The plan claims that consideration of heritage and landscape constraints have been taken into account when in the instance of Waterston Ridge they clearly have not.
- Importance of further assessments of impacts of development at Waterston Ridge.
- There is no consideration given to the cumulative impact of targeting the area immediately to the north of policy DOR13.
- Concern that heritage assets such as scheduled monuments and the Gillingham Royal Forest have not been fully recognised as constraints in the wind energy study.
- Concern that the report is based on selective evidence through a desktop study.
- Concern with the clarity of the maps, particularly in the hard copy of the plan.
- No maps should be included at early stage in plan.
- Greater weight should be attached to the generation of renewable energy when considering development proposals.

- Development generating renewable energy appears to be subject to greater restrictions than development related to the extraction of fossil fuels.
- The planning process allows people to make comments through representations, and for this reason the respondent does not consider that there is a need for further consultation.

Land Between, West Bourton and Whistley Farm, Silton, Gillingham - Planning applications 2/2008/0661 & 2/2010/0731/PLNG

Silton Parish Council

- Proposed wind turbine designation over Silton should be removed - costly 11 day appeal in 2012 dismissed a scheme to construct 4 wind turbines in the parish as it would harm setting of AONB and heritage assets.

Public response

- The sites identified in Fig 6.5 include the same fields as were the subject of two planning applications (Wind map attached) for which the then Local Planning Authority refused permission.
- Refusal was appealed and the Inspector dismissed the appeal based on the harm the character and appearance of the area and the setting of the AONB and the setting of heritage assets.
- The harm arising from the impact to the AONB and heritage assets would not be outweighed by wider environmental and economic benefits of the scheme.
- As such this site should be discounted. The 12C Grade 1 listed Church of St Nicolas in Silton is just over 1km to the north east of the site and therefore less than the 3km constraint that would have precluded the site from consideration.
- Table 3.1 shows an overwhelming preponderance of 4.2MW turbines with a potential total of 250 across the whole county.
- Turbines with this power rating typically have blades with a swept diameter of 150m and hub heights frequently well in excess of 100m. Is the Council seriously proposing that these gigantic industrial turbines should be located throughout rural Dorset?
- Silton and Gillingham would be controversial given 'Save our Silton' campaign against wind turbines, support for wind turbines in the right place.
- Inconceivable that land at Manor Farm, Silton, North Dorset is considered possible site following planning refusal. Proposal would be totally inappropriate in Blackmore Vale as would severely impact natural beauty.

Other potential sites

Town and Parish Councils

- The areas in Wareham St Martin are forested in the main and the rest of the land is heath. Neither areas are suitable for wind turbines. Farmland is good for solar farms, much more efficient than wind turbines, this would be supported fully.

Public response

- The best and only efficient locations for wind turbines to be located is along the coast and on high ground in the AONB – anywhere else the average wind speed barely turns the blades.
- Corfe Mullen having a high elevation would seem to be a good candidate for wind energy development.
- Surprised that Portland has not been considered - high wind levels, much unused ex- MoD land.
- Rampisham Down should be considered.

Off-shore wind (Including Navitus Bay)

Town and Parish Councils

- The setting of the Jurassic Coast World Heritage Site would not be materially harmed by the proposed Navitus Bay wind farm.
- The council should challenge the decision relating to the Navitus Bay Wind Farm – should be revisited as it could generate the quantities of energy required.

Cranborne Chase AONB Team

- Suggestion that wind energy development is much more appropriately garnered in offshore wind farms - not only can the scale of development be much larger but also the wind resource is much more consistent.

Local environmental groups (non-statutory)

- Need to reconsider the off-shore wind proposal such as Navitus Bay - could make the county self-sufficient.

Public response

- Offshore wind farms are barely mentioned in the plan.
- Provision of offshore wind farms should be supported - support for Navitus Bay wind farm.
- Suggestion that we may need larger denser wind farms.
- A wind farm 10-20km offshore on the scale of the Navitas scheme, could provide all the electricity for the households of Dorset and BCP at lower cost than new fossil fuel or nuclear generation.
- View of the wind farm would give younger generations hope for the future.
- Consequence of not abating climate change will be higher sea levels and more rock fall due to increased cliff erosion, both of which would make access to the World Heritage Site geology more difficult if not impossible.
- The World Heritage Site rating does not mention the views out to sea.
- Wind farm would have no direct physical effect on the geology.
- Offshore projects take far longer to install, are more expensive and require significantly more maintenance.
- Having looked at offshore wind farms in Norfolk and the North East it is very apparent that the visual impact is low under most weather conditions due to heat haze, cloud etc.
- Tendency at the moment to favour offshore wind projects because they cause less “harm” to the landscape needs reviewing.
- Revive Navitus Bay Wind Farm.
- Some of the adverse impacts from wind farm development has not been proven (i.e. ‘flicker’).

12.3. Q2. Are there any planning issues that would need to be resolved to enable community backing to be secured?

Strategy

Town and Parish Councils

- Needs to be a clearly laid out strategy that evidences why significant wind generation is absolutely required to meet the needs of each of Dorset’s communities to avoid a proliferation of applications and a consequent oversupply of energy.

- Considers that the local plan should set out a clearer framework for guiding wind development.

Public response

- Local plan is not consistent with NPPF - require positive strategy that maximises the potential.
- The NPPF is negative ruling out land and limited development.
- Large Wind will only be acceptable if it's the only proven way -and this is backed up with statistics.
- Any scheme needs appropriate and careful planning and as much mitigation as is appropriate but emergencies require firm action as the present crisis has so clearly shown.
- Acres of derelict wind farms are testament to the practical failure of this technology.
- Need to do more work looking at land uses and geology over and above simply looking at available wind resource and environmental constraints.
- Turbines need to be sited in well researched areas and a significant distance from towns and villages.
- Not clear how connecting infrastructure (cabling and substations) for wind turbines will be provided.
- Respondent considers that the weight attached to different planning considerations when taking planning decisions needs to be reviewed.

Community engagement and support

Town and Parish Councils

- Community feedback schemes so the local community benefits directly from energy produced should be mandatory feature of any enterprise.
- Should be more engagement on this issue with the council and that sites should be identified by local communities (it advocates a community led approach).

Local environmental groups (non-statutory)

- The council should be encouraging communities and landowners to put up small turbines.
- Acceptability seems greatest when a lot of local people can jointly plan and finance a turbine, or at least a local school is involved, or there is an energy coop, using both wind and sun, where local people can buy local power too.
- The interpretation of 'community-led' needs to be softened so there is a presumption in favour of turbines.
- Importance of planning impacts identified by the affected local community to be fully addressed.

Development industry

- Indicates that there are planning issues that would need to be resolved to enable community backing to be secured.
- If the Council want to make meaningful gains in renewable energy production then a requirement for local support / neighbourhood plan allocations may not be the best way to achieve this.
- Developments can be very contentious and may fail to gain local support even where the benefits and impacts are fully addressed.
- Contentiousness would also preclude 'private' sites coming forward which may be viable and acceptable other than not being community led/supported.
- Give the community the choice - wind or nuclear.

Public response

- Objections should be fully investigated & addressed - full explanations of all issues identified would be required.
- More consultation needed with town and parish councils - regarding noise and maintenance access - with due consideration for visual impact.
- Suggestion of a financial bonus or reduced rates for communities to encourage uptake.
- Planning judgement must be made to understand whether proposal has backing of the affected local community.
- Community backing needs to be defined in a way that vocal minority cannot make decision for everyone about Dorset's contribution to the continuation of human civilisation.
- Local communities may not be best placed to take strategic decisions on this matter and local plan policies should not impose restrictions on wind turbine development.
- The very high need for local agreement to wind energy plans seems an inappropriately high bar to these developments.
- The council should also be encouraging communities and landowners to put up small turbines - Many communities would like to have a source of local renewable energy.
- Electricity generated in Dorset should be prioritised for Dorset residents.
- Thus 'community backing' needs to be determined in such that a small number of people do not effectively have a veto.

Lifespan and schemes

Public response

- Concern with the limited life of turbines.
- Reference should be made to the temporary nature (say, 25-30 years) of onshore wind installations.
- A clear statement should be made about how their removal and reinstatement of the land will be funded.

Scale of schemes

Town and Parish Councils

- Smaller schemes would be better received and should be clustered so as to minimise visual intrusion over a larger area.
- Placing a strict limit on the height of turbine blades, at say between 50 – 80m, is likely to make them more acceptable to local communities.

Public response

- Scale of development needs to be carefully considered in local environment.
- Any wind farms approved must have the turbines sited such that a circle equivalent to 4 times the rotor diameter.
- Rotor diameter must: be included within the boundaries of the site, unless it has the consent of neighbouring landowners and not overlap footpaths or bridleways.
- No two wind turbines should be closer than 7 rotor diameters, for operational reasons.
- A restriction on the height of turbines may make them not feasible.
- Smaller groups of turbines are better than one giant area.

Landscape impacts

Dorset AONB Team

- Queries how landscape constraints have informed potential sites - labelled as areas of lesser ecological risk.
- Fundamental review of areas required as areas which have had previous objections included - Slyers Lane and West Dorset wind farms.
- There is a genuine risk that the approach adopted may encourage applications in areas that may subsequently be considered unsuitable, due to their impacts.

Local environmental groups (non-statutory)

- Potential cumulative impact of multiple installations in combination with other development will be crucial - recommend that a strategic approach to this is developed.
- Concern that landscape constraints are not included – need to take into account cumulative effects.

Town and Parish Councils

- Operators often propose masts that are wholly out of proportion to the landscape, especially as they are often sited on high ground.

Public response

- Concern with landscape impacts.
- Classification of AONB should become fair game for wind turbine development.
- Views about the visual impact of wind turbines versus the need to move to zero carbon as quickly possible have changed radically.
- Frustration that wind turbines would not be allowed in AONB.
- Landscape assessments are partially subjective however climate change concern has increased since they were performed therefore they should not be given as much weight.
- Landscape and heritage impacts should be given less weight in decision making.
- Should remove landscape constraints.
- The visual impact of wind turbines is very subjective - considers that turbines blend in well with the landscape, and appreciates the blend of ancient and modern.
- Dorset's small scale landscape does not lend itself to large scale onshore wind turbines without major damage.
- A line of windmills could add a great deal of interest to the landscape and a great symbol of Green Dorset.
- Concern with visual impact of turbines.
- Concern that communities would not appreciate visually dominating wind farms nearby.

Heritage impacts

Historic England

- The methodology to assess wind development opportunities shown in Figures 6.5 and 6.6 is not robust. It is not clear which heritage assets have been taken into account. It does not provide an appropriate evidence base. An additional assessment is required to support any allocations.

Town and Parish Councils

- Need to seek the advice of Historic England in respect of scheduled monuments or other heritage assets.

- Further work on heritage constraints is needed in order to refine the areas of search.
- Consider that the wind turbines should only be permitted in suitable locations taking account of landscape, ecology, historic structures and culture.

Public response

- Concern with heritage impacts.
- Some of the conditions previously imposed on planning for renewable energy such as visual impact and proximity to a heritage site should no longer be given high priority.
- Heritage should not be constraint as this includes fossil fuel based economy causing climate change.
- Heritage assets will be there long after turbines have been taken down.
- Must recognise we cannot pass more attractive parts of heritage to future generations without tackling aspects that are harmful to others in future.

Biodiversity impacts

Natural England

- Advises that the identification of land at the plan stage must be supported by sufficient environmental information to reasonably determine that the areas are worth further investigation.

RSPB

- Policy should provide the necessary requirements to avoid siting any development within or adjacent to any sensitive wildlife sites or across a migratory flyway.

Environment Agency

- Needs to be ensured that these sites would not be better used for other purposes, such as largescale native tree planting sites to off-set climate change/meet mitigation /compensation /Biodiversity Net Gain targets, etc.

Local environmental groups (non-statutory)

- There must be minimum adverse impact on wildlife including buffer zones around sensitive habitats for both large and small scale developments.
- Concern with risks to birds, bats and insects through collision, disturbance and displacement.
- Land proposed for each installation must be subject to biological survey and a commitment to ongoing regular monitoring.

Public response

- Areas containing windmills can be part of a bio-diverse habitat.
- Significant impact on birdlife.

Dorset National Park

Public response

- No mention of Dorset National Park - villages nearby to areas may apply to be part of DNP which would mean no windfarms in those areas.
- Concern with impacts on the Dorset National Park proposals.

Amenity impacts

Sport England

- Careful consideration is required around air sports, cricket and sailing - need wind shadowing studies if there are to be wind farms near stretches of water just for sailing or air sports.

Public response

- Windfarms should not adversely affect the local community.
- Consideration must be given to the noise they make.
- Wind turbines are not silent and can carry low frequency noise a considerable distance. They should be confined to completely unpopulated areas.
- Constraints surrounding ecology, noise and shadow flicker are important however aesthetic ones are not necessary.
- The council should consider different colour finishes to turbines.

13. Policy COM11: Small Scale Wind Energy Development

13.1. Approach

Overall approach

Natural England

- Support for the policy, subject to amendments.

Dorset Wildlife Trust

- Amended Policy COM11 to cover all wind development.

Town and Parish Councils

- Support for the approach.
- It is acknowledged that protection of the environment is important and covered elsewhere in the local plan.
- When trying to achieve no harm or minimal harm there should be a presumption in favour of renewable energy sources.
- Considers that smaller scale renewable energy development would be better received.
- This policy acts as a deterrent to provision of renewable energy.
- The emphasis should be on encouraging renewable energy generation as the preference, with mitigation of harm a requirement rather than prevention of harm.
- Small scale turbines are viable on Portland, the Neighbourhood Plan refers to the need for appropriate designs, and the local plan policy should provide flexibility where community support can be achieved and on Portland give consideration to migratory bird paths.

Local community groups (non-statutory)

- Should be maximising the benefits on offer from our geographical location.
- Schemes should be financially viable together with proven energy efficiency.

Local environment groups (non-statutory)

- All applications should be judged on their own merits.

- COM11 is not actually needed as small scale wind turbines should be viewed on a par with all other renewable energy sources in COM10.

Development industry

- Agreement with suggested approach and wording, subject to changes.
- Positive approach to allow carbon / renewable development should be similar to the approach in Policy COM 10 - for meaningful addressing of climate change.

Public response

- Endorse the principle of the policy, sources of wind energy are important in tackling climate change.
- Insisting on small turbines in valleys will contribute nothing to the grid, though they may power a few farms, a hamlet or a business.

Paragraph 6.9.5 - Maximum of 15m to the hub

Local environment groups (non-statutory)

- The height limit should be removed as turbines less than 15m are not economical for electricity generation.

Cranborne Chase AONB Team

- There is scope for confusion in relation to the height of any 'small scale' turbines as a hub height of 15 metres is likely to mean a tip height of 20 metres or more.

Public response

- 15m turbines (6.9.5) will be visible from the AONB in the north and the Jurassic Coast AONB to the south.
- Small wind turbines less than 15m in height are not economical for electricity generation - should be removed and all applications judged on own merits.
- no objection to limited installations at industrial estates where no impact on local residents.

Paragraph 6.9.5 - Community-led

Development industry

- No rationale provided for why small-scale wind energy development must be community / neighbourhood plan led when there may be opportunities for such developments to be provided for private sites - on farms and estates.

Local environmental groups (non-statutory)

- Concern with the unreasonable condition that small-scale turbines should be community-led or set out in a Neighbourhood Plan.

Town and Parish Councils

- There should be policy flexibility where community support can be achieved.
- Important that such developments are only approved where they are community led.

Public response

- Concern that the condition for schemes being community led or set out in a neighbourhood plan is unreasonable.

- The requirements for community lead/defined through a neighbourhood plan are likely to discourage small scale wind energy development.
- The term 'community lead' is not defined in the local plan.
- Suggest that the council removes the requirement for proposals to be 'community lead'.

Paragraph 6.9.6 - Neighbourhood plan

RSPB

- It is not appropriate for wind energy development to be determined through neighbourhood plans. Siting of wind turbines should be determined at a strategic level within this plan. This made clear in para 6.9.6 but needs to be stated at the beginning of the section on wind to avoid confusion.

Town and Parish Councils

- Small wind turbines are viable on Portland and the Neighbourhood Plan refers to the need for appropriate designs.

Public response

- Even at smaller scale on the high ground to the north of Dorchester the impact of both wind and solar renewables would be much wider than could be accounted for by a singular neighbourhood plan (6.9.6) because of the height of the topology.

Paragraph 6.9.7 - Area of outstanding natural beauty (AONB)

Natural England

- First bullet should include reference to the protected landscapes of the AONBs. We suggest this is achieved by adding a further sentence, "Within AONBs schemes will only be permitted where their scale and setting ensures they do not conflict with and contribute towards the aims and objectives of the relevant AONB Management Plan."

Cranborne Chase AONB Team

- Policy does not mention the helpful paper provided by Dorset AONB on ways to integrate small scale wind energy into the landscape.
- Tendency for small scale wind farms to be intrusive.
- Concern with the colour of turbines - light grey or off white makes them stand out in the landscape and be unnecessarily intrusive.
- Suggestion to include a need for support from the relevant AONB Partnership for schemes.

Dorset AONB

- A further aspect which might be addressed through the policy is the maximum number of turbines that can be included in a single community wind farm development.
- It is possible that a community scheme including numerous turbines of the scale indicated could be perceived to be 'large-scale'. Including a threshold, for example 3 turbines, would enable to policy to constrain this eventuality.
- The Plan could refer to the Dorset AONB's guidance on wind energy development, which provides relevant information on siting and design issues.

Paragraph 6.9.8 - Heritage assets

Historic England

- A historic environment evidence base is needed to support the allocation of wind energy developments in neighbourhood plans.

Paragraph 6.9.8 - Landscape

Town and Parish Councils

- Considers that renewable energy development should be clustered to avoid wider landscape impacts.
- Given the climate emergency, production of renewable energy should take precedence over visual amenity.

Paragraph 6.8.9 - Residential amenity

Sport England

- There is a concern that wind energy can impact on a number of sports including cricket sailing and air sports. Careful consideration and wind shadowing studies may be required if there are to be wind farms near stretches of water just for sailing or air sports.

Public response

- Consider that the policy should ensure that no adverse harm to residential amenity is created as a result of wind energy development, rather than proposals simply minimising the harm.
- What constitutes as ‘minimising’ can significantly vary. As such, the policy should be amended to be more precise.

Paragraph 6.9.10 - Biodiversity

RSPB

- Even small-scale wind developments need to be sited away from sensitive sites, and it cannot be assumed that small-scale proposals will not be harmful if poorly sited – needs to be made clear in para 6.9.10, with specific reference to NSN sites and sensitive species such as foraging nightjars and bats.

Town and Parish Councils

- Consideration must be given to migratory bird paths.
- Consideration should be given when granting permissions for this type of installation of their impact on bird life.

13.2. Policy

Introduction

Dorset Wildlife Trust

- COM11. Small scale wind energy development.

Criterion I - Bullet point 1

Historic England

- Expand COM11 criterion I. to cover seascape and adverse impacts on heritage assets and their settings.

Criterion 1 - Bullet point 2

Environmental groups (non-statutory)

- Amend second bullet point to read: - “the proposal minimises harm to residential and recreational amenity by virtue of noise, vibration, overshadowing, flicker, or other detrimental emissions, during construction, its operation and decommissioning.”.

Criterion I - Bullet point 3

Dorset Wildlife Trust

- Would suggest that Policy COM11 is amended to cover all wind development and that the criteria are amended to cover all wind development including re-wording the biodiversity criteria to better reflect the mitigation hierarchy:
 - adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are avoided, residual impacts satisfactorily mitigated and net gain for biodiversity achieved as with all developments.

Natural England

- The third bullet does not provide adequate protection to wildlife interests as it fails to apply the mitigation hierarchy, nor reflect the need for renewables to also contribute to addressing the ecological emergency declared by the Council. The bullet should be reworded to, “adverse impacts upon designated wildlife sites including local sites, or priority habitats and species must be avoided, elsewhere where impact to wildlife interests are unavoidable, developers must provide mitigation or, as a last resort, compensation. All schemes must meet the requirement for biodiversity net gain as set out in policy ENV3.”.

Environmental groups (non-statutory)

- Amend third bullet point to read – “individual and cumulative adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are assessed and satisfactorily mitigated.”.

Ramblers Association

- Public rights of way should be included in the 3rd bullet point.

Additional Criteria

New Forest National Park Authority

- Should include a criterion recognising that under the 'duty of regard' the proximity of the New Forest National Park may need to be taken into account when considering proposals for wind energy developments.

Natural England

- Advises that the criteria for small scale wind development should also include a restriction on the number of turbines, or equivalent structures should new wind energy technologies emerge.

14. Policy COM12: The Provision of Utilities Service Infrastructure

14.1. Approach

Overall approach

Development industry

- General agreement with the approach, subject to viability.

Town and Parish Councils

- The Plan should support the many existing local rural businesses to provide sustainable improvements including those which address climate change issues.
- Provision of EV charging points should be provided as part of utilities infrastructure, or if not under this policy then elsewhere in the document.
- Presumption should be the delivery of all utilities fit for all in the future of the 21st. century.
- Would encourage the Council to adopt a policy statement which ensure that all utility providers / statutory operators work with the Council in the furtherance of the strategies and policies.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Need to raise the threshold and, as with COM10 above, the presumption should be in favour of the delivery of utilities fit for all in the 21st.

Public response

- General agreement with the approach.
- This policy should be more prominent and placed at beginning of chapter.
- Would be better if infrastructure needs were made a condition of planning applications.
- Provision of EV charging points should be provided as part of utilities infrastructure.
- New development should be supported with infrastructure.

Utilities

National Grid

- No comments to make regarding the consultation.
- Summary of the role of National Grid.
- National Grid is happy to provide advice and guidance to the Council concerning their networks.

Natural England

- The policy covers a wide range of potential development, including the provision of new utility infrastructure (e.g. pipelines, cabling, etc) - Such projects often benefit from permitted development rights, however, these do not apply to schemes that are likely to have an adverse effect on a Habitats Site, or would have a significant environmental impact that triggers the need for an Environmental Impact Assessment (EIA).

Environment Agency

- On a strategic level we would wish to see evidence that water companies and any other providers have been contacted and have confirmed there is sufficient capacity in their systems, or that any required upgrades would be feasible and could be put in place.

Wessex Water

- Would welcome support for new or extended water recycling centres, water treatment works and associated infrastructure, in the same way as telecoms and radio equipment in the policy, subject to location and designed to minimise adverse impacts.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Supply of fresh drinking water is important when considering increased housing and this aspect has not been overlooked throughout this draft plan.

Town and Parish Councils

- Consider that high quality utilities should be delivered to support future growth/prosperity.

Public response

- No new developments without working sewerage system.
- Existing waste and water treatment sites, sites with planning permission and allocated sites should be safeguarded from redevelopment, change of use, or sterilisation by other forms of development.

Telecommunications and radio masts

Cranborne Chase AONB Team

- Cranborne Chase AONB Management Plan seeks to remove intrusive masts and cables.
- AONB is currently engaged with a Department for Media, Culture and Sport sponsored small cell neutral host telecommunications project to establish methods for extending 5G coverage without the need for traditional style masts.
- Not inclined to support further traditional masts and the infrastructure.

Dorset AONB

- It is suggested that the policy and corresponding text could be modified to explicitly advocate mast-sharing by service operators to minimise landscape and visual effects.

Town and Parish Councils

- Support of improvements to 5G infrastructure.
- Telecommunications, and 5G infrastructure will become further necessary with homeworking.
- The sharing of masts by different mobile operators should be encouraged particularly where ground equipment does not become too intrusive.

Public response

- Mobile phone coverage should extend to all rural sites not yet covered.
- The Asker Valley and other deep-set Dorset valleys have poor mobile signals, which is a concern for locals and businesses, including those providing health services to the elderly / less mobile.
- Paragraph 6.10.3 - self-certification, presumably unverified, of non-ionizing radiation emissions by telecommunication operators, is not good enough. The operator should pay Dorset Council to commission an assessment by an independent expert.
- 100% 4G/5G coverage is vital for rural communities.
- Need for more masts in rural areas.
- Wind turbines could be used as telecommunications masts to assist internet coverage.
- Suggestion that the approach is insufficient to address the issue of limited or non-existent mobile phone connectivity in many areas, such as a good deal of Cranborne Chase.
- Need for modern communication systems for home learning - education service should also be involved in the planning for the future.

Broadband

Home Builders Federation

- Does not consider that the local plan should set localised targets for infrastructure which exceed those requirements in Building Regulations (which include a requirement for developers to work with service providers to support delivery of gigabit capable [operating at speeds over 1000 Mbps] broadband - subject to a commercial cost cap).
- Note that Building Regulations will support gigabit-capable connections with new development from more than one network operator.

Development industry

- Given the rural nature of much of Dorset, the need to provide direct fibre to premise (FTTP) access should only be required where it is both practical and viable to do so.
- The provision of full fibre broadband connections to each home on major development sites is supported subject to practical feasibility and viability.
- Suggestion that advances in wireless infrastructure may provide an alternative opportunity to develop fast networks.

Federation of Small Businesses

- The trend of home working likely to continue and there is a need to embrace the opportunities created. Reliable Superfast broadband and public transport infrastructure will be critical.

Town and Parish Councils

- General support for the provision of broadband, and agreement with the approach.
- Some suggestion that the policy needs strengthening in respect of broadband in rural areas.
- Concern with issues of Broadband and internet connectivity that remain in the rural areas.
- Concern that issues with Broadband and internet connectivity in the rural areas have been ignored, and that a plan is required to deal with this.
- Need for public transport and ultrafast broadband connections to isolated villages.
- Broadband is essential for education and business as well as recreation.
- Emphasises the need for excellent IT/broadband to maintain the vitality of the area.
- Importance of Broadband connectivity for home working.
- There should be a definition of minimum speed for “high speed electronic communications” as specified in paragraph 6.10.9, and an expression of the aims to be carried forward into the policy statement.

Beaminster and Villages Local Area Partnership

- Concern that Fibre Broadband with Superfast Connection still isn't reaching everyone in rural Dorset, which if working from home or running a business can affect day to day operations.

Beaminster Area ECO Group

- Beaminster area is still patchily served. Broadband is a vital service that should be available throughout our group of parishes.

Public response

- General agreement with the approach in relation to Broadband provision.
- FTTP must be provided to all new homes regardless of the size of the development.
- Support provision of superfast broadband provided it does not have adverse impacts on views / environment.
- Concern with poor Broadband provision in rural areas.

- Concerns that the superfast network has spread to “deep-rural” areas at the expense of edges of the small market and coastal towns.
- Broadband coverage should extend to all rural sites not yet covered.
- Fibre Broadband should be extended across the county.
- Importance of Broadband for people working from home.
- Importance of Broadband for start-up businesses.
- Importance of Broadband for leisure and entertainment and connecting with family and friends.
- Importance of Broadband for businesses and employment in rural areas.
- Importance for enabling home working and reducing carbon emissions from travel to work.
- Broadband including fast fibre are essential for homes and for business large and small.
- Broadband policy should address the needs for the whole community, not just new developments.
- The term Broadband should always be addressed in term of its Mb or Gb connection speed – vague terms such as full fibre, super-fast or high speed broadband are used to hide poor provision.
- The connections need to be superfast fibre broadband with a clear target for download speeds of say in excess of 30 Mb/s.
- Suggestion of free full fibre broadband to families that are poor – such as children received free school meals, handicapped people etc.
- Concern that the policy omits plans to bring full fibre to existing homes.
- Where Fibre is not available the minimum must be provision of ducting to boundary of the site.
- Should ensure Full Fibre connection is installed by the easiest means which is probably during construction of new houses.
- Residents (not developers) should take the responsibility for securing broadband connectivity.
- Specific requirement for full fibre broadband connectivity may be overly prescriptive (and therefore restrictive to alternate technologies) - an alternative technology (e.g. 5G) may provide equivalent data speeds (suggest revision to the suggested drafting).
- Support provision of superfast broadband provided it does not have adverse impacts on views/environment.
- Need for modern communication systems for home learning - education service should also be involved in the planning for the future.

14.2. Policy

Policy numbering

Cranborne Chase AONB Team

- Inconsistencies with policy numbering within the policy, and it appears that some policy paragraphs have been omitted.

Criteria II

Environment Agency

- Support a policy relating to the provision of utilities service infrastructure - would require adequate foul drainage, water supply and waste management infrastructure to serve proposed developments.

Public response

- Concern with ambiguous wording in the use of will and should for different scales of development.
- 'Development will not be permitted' definition needed, houses, or what?

Criteria III

Historic England

- Policy COM12, criteria III and supporting text should consider how the provision of utilities infrastructure can negatively impact on the significance and settings of heritage assets as well as seascape.

Public response

- Policy COM12, criteria (iii) - for sites with more than 2 dwellings, delete 'unless it is not practical'.
- The inclusion of the phrase "that all technically feasible alternatives have been explored" is not needed, if there were any feasible alternatives they are certainly going to be more expensive.

Criteria IV

Town and Parish Councils

- Policy COM12, clause IV - wording should cater for future changes in minimum standards. It is unlikely that FTTP will remain the minimum required standard for the life of the Plan.
- For sites with more than 2 dwellings, delete 'unless it is not practical'. This is now an essential requirement.

Bridport Local Area Partnership (BLAP)

- Support for criteria IV of the policy, however there is concern about the get out clause for small development sites.

Public response

- Concerns that the proposed policy is discriminatory in that if a settlement does not have a major development site it will not receive full fibre broadband.
- Concerns with the vagueness of the term 'major development' – meaning different things in different places.
- Would like to see the policy extended to include full fibre broadband connections to every new home built, including those on sites with 1 to 9 homes.

Additional criteria

Natural England

- It will be important to ensure all proposals covered by policy COM12 meet the local plan policy requirements set out in ENV2, ENV3 and ENV4. Suggest this achieved by adding an additional policy clause: "All new provision for utilities service infrastructure must be in full accordance with policy ENV2, ENV3 and ENV4".

Town and Parish Councils

- Proposed additional policy criteria to require that existing residential and commercial properties will be subject to priority access to the development of improved, up to date digital and telecommunications infrastructure – so that no current property is less up to date than any new build.

Public response

- Policy should incorporate protection of biodiversity, such that access can be provided to utilities service infrastructure without damaging trees and other wildlife.