



Dorset Council **Local Plan**



Economy

2021 Consultation
Summary of Responses

January 2023



Dorset
Council

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1. Economy

1.1. Introduction

Paragraph 5.1.1 - Economic Growth Strategy

Portland Port

- The Western Dorset Economic Growth Strategy (2017 – 2033) should play a key and central role in the overall economic strategy.

Purbeck & Poole CPRE

- The impacting effect upon the proposed Local Plan created by the Dorset Enterprise Partnership require explanation and justification since it is perceived that associated initiatives are simply encouraging existing business to move around rather than fostering new business.

Town and Parish Councils

- Local government may facilitate some economic growth but delivery is down to enterprises.
- There are no policy proposals which relate to 'high quality' jobs, there are simply allocations of land for certain business types.

Public response

- Support for 5.1.1 however need to deal with the reality of employment land that is dirty, unsustainable and threatens health and wellbeing and quality of life of Dorset residents.
- lacks clear focus or strategy, simply referring to growth across all industries - need to more clearly explain and how links to Dorset LEP's proposals and the rural economy and how this may be impacted from Brexit fallout.
- Specific actions/outcomes required to explain how the council will attract good quality employment opportunities.
- The plan should look at more ways to attract inward investment into the area so that the low wage economy can be improved in the mid to long term.
- Council's strategy will not encourage businesses/employers paying higher wages.
- The local plan should put more emphasis on increasing the mean salary in Dorset by attracting businesses that pay in the top quartile of UK employment (i.e. at least c. £45,000 per annum.).
- As well as enabling those who grow up in Dorset to stay in Dorset, the Council should also encourage people from beyond the County to work in the area.
- The Council should look at initiatives to encourage the inward migration of businesses, which might include incubator space for high-end business activities and initial low-cost office space rental.
- The plan shows no leadership or direction in how the economy should develop.

Paragraph 5.1.4 - 'The economy and the environment are closely linked'

Historic England

- Welcome the links between Dorset's economy and the historic environment.

Dorset Climate Action Network

- Endorse the need for symbiosis and mutual benefit between the economy and Dorset’s high quality environment. Approach implies that land should not be newly zoned for employment within the AONB or the Green Belt.

Community groups (non-statutory)

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

Town and Parish Councils

- Endorsement for the recognition of the need for symbiosis and mutual benefit between the economy and environment.

Public response

- To say the economy and environment are closely linked is an overstatement. The local plan should not over-focus on protection of the environment or over-emphasise the detrimental impact of employment land growth, but on creating land facilities and infrastructure to attract new business and providing affordable housing.

Paragraph 5.1.5 - Rural economy

Developers/Landowners/Agents

- We feel that the draft Plan needs much more, in fact a whole sub-section and a new policy, on rural enterprise and innovation.

Paragraph 5.1.6 - Key Challenges

Historic England

- Welcome mention of the key challenges and opportunities, including climate and ecological emergencies, the recovery of tourism and historic centres from COVID-19, and the impacts of Use Classes Order changes.

Dorset Climate Action Network

- Welcome the mention in the fully appreciate the implications for the economy of the declaration of a climate and ecological emergency, Brexit and the Covid-19 pandemic”.

Developers/Landowners/Agents

- We note the reference at paragraph 5.1.6 to the impacts on the economy of climate change, Brexit and the Covid-19 pandemic. We agree that further work is required – there will be problems and opportunities. We would like to position the Estate and, more generally, the rural economy, to succeed and transform in this challenging context. A flexible approach is key.
- There is need for an ambitious (post-pandemic) economic recovery strategy for Dorset – within which planned development will play a part.

Town and Parish Councils

- Paragraph 5.1.6 discusses the effects of Brexit, but this is not really addressed in the strategy in any meaningful way, or any real consideration given to what impact this could have on housing (not just employment) needs.

Public response

- Economic growth strategy requires revising in light of covid and brexit and strategy for responding to climate and ecological emergencies - economic growth strategy is not a good title for what needs to be done - there have been a paradigm shift.

Climate Change & Ecological Emergency, and the Green Economy

The Purbeck Energy Group

- Whilst laudable this strategy does not go far enough. The plan should actively promote a green, local and circular economy.
- It should take into account the likelihood of more home-working and flexible or shorter hours.
- It should encourage industries that are green; that produce, install or supply renewable energy; that retrofit buildings with energy saving measures; that promote eco-tourism; and that use low carbon technologies.

Beaminster Area ECO Group

- Find ways to 'add value' to and make greater use of local resources – land, food, timber, other building materials, wind and water power, solar power – through local (and, where appropriate, social) enterprise.

Dorset Climate Action Network

- Wish to see movement towards a Green Economy, sustainable in use of resources, with a strong dimension of local self-sufficiency (e.g. in food) and of circular activity including use of local timber in new buildings.
- Council should be active in securing the development of workspace, the regeneration of town centres and economic diversification on farms.
- Wish to see a strong reference to the implications of the Council's Climate and Ecological Emergency Strategy.
- Development focused on economic growth and diversification should contribute to the imperative of achieving net zero greenhouse gas emissions and observe high environmental and social standards.
- Processes related to the climate change strategy should be seen as a major opportunity to generate a green, local and circular economy and to generate a wide range of new jobs.
- Importance of the county's natural, historic, architectural and scenic heritage and the nature recovery programme as a significant source of employment.
- Highlighted that there is scope for sustainable use of the county's natural resources such as timber resources.
- Look to Dorset Council, BCP Council and all relevant organisations to secure a good share for Dorset of the funds which the government is investing in the Green Revolution.
- Council should launch a Regenerative Dorset programme, aiming to transform its economy to be green, sustainable in use of resources, with a strong dimension of local self-sufficiency (notably in food) and of circular activity including use of local timber in new buildings.

Dorchester Churches Ecology Group

- We look for a much closer link with the Dorset Climate Strategy.
- We endorse the statement of the mutual benefit between the economy and Dorset's high quality environment but we want to see a stronger link, with insistence that all future

development should contribute to the imperative of achieving net zero greenhouse gas emissions.

- This includes commitment to converting from fossil to renewable fuels, retrofitting existing buildings, enhancing wildlife habitats and other action to create a green, local and circular economy and to generate a wide range of new jobs.
- We agree with the Climate Action Network suggestion that Dorset Council should launch a Regenerative Dorset programme, aiming to transform its economy to be green, sustainable in use of resources, with a strong dimension of local self-sufficiency (notably in food) and of circular activity including use of local timber in new buildings.

Town and Parish Councils

- Need a strong reference to the implications of the Councils Climate and Ecology Emergency Strategy.
- Development focussed on economic growth and diversification should observe high carbon-negative, environmental, and social standards.
- The essential actions to address the climate and ecological crises should be seen as an opportunity to generate a green, local and circular economy as well as providing a wide range of new jobs.
- Dorset Council Local Plan should include policies/strategies which encourage/support the Green Economy.
- Wish to see the addition of proposals related to: management/enhancement of the natural, historic, architectural and scenic heritage, sustainable use of natural resources such as timber and processes of responding to the climate crisis.

Public response

- Support for sustainable/clean/inclusive economic growth across Dorset Council area.
- Businesses should be vetted to determine whether they are aligned with the 'net zero' goals for reducing carbon emissions.
- The council should refuse planning permission for businesses that are not likely to meet the 'net zero' goals for reducing carbon emissions.
- The local plan should support 'Green Economy' (including building work connected with improved environmental standards for new and existing housing stock).
- Importance of the Green Economy and creating a pathway for the rural economy.
- The Plan needs a pathway for the rural economy with new workspace being built in many towns in the County and capitalising on opportunities for jobs in the "Green Economy".
- Policies in the local plan should support employers/businesses in rural areas with an emphasis on the 'Green Economy'.
- The plan needs to include a pathway which supports transition to a 'Green Economy' (including those available from changing from non-renewable to renewable fuels, changes to buildings and enhancing wildlife habitats).
- Having a strong local and sustainable economy is central to delivering the changes needed to address climate change. This does not necessarily mean establishing large new areas of employment which are at odds with the interests of local communities and the environment and bring increasing pressure for new housing and other infrastructure.
- Support what Dorset Climate Action Network says should be the priorities for what the Plan needs to say about the economy.
- Need for new workspace being built in many towns in the County and capitalising on opportunities for jobs in the "Green Economy".

- The next draft of the LP should deal with the fossil fuel industry.
- There is much scope for sustainable use of the county's natural resources, for example the potential for use of the County's timber resources within the construction industry.
- Need to aim to transform the economy to be green, sustainable in use of resources, with a strong dimension of local self-sufficiency (notably in food) and circular.
- Council to secure a good share for Dorset of the funds which the government is investing in the Green Revolution.
- Great attention will be needed on applying techniques that minimise 'non-Green' waste, carbon-dioxide waste to arrest climactic changes that have already affected Earth.
- Need to encourage employment that mitigates climate change such as R&D, renewable energy, retrofitting houses, sustainable farming, ecotourism, repair and renewal, home working etc.
- The Climate and Ecological Emergency Strategy should be used to show the direction in which the economy can develop green, local and circular.
- Development focused on economic growth and diversification should contribute to the imperative of achieving net zero greenhouse gas emissions and observe high environmental and social standards.
- The essential processes of reducing greenhouse gas emissions, converting from fossil to renewable fuels, retrofitting existing buildings, enhancing wildlife habitats and other action to address the climate and ecological crises should be seen as a major opportunity to generate a green, local and circular economy and to generate a wide range of new jobs.
- The message that significant and sustained increase in productivity must not come at the expense of the environment is essential and non negotiable and should be reinforced.
- Without a secure and protected environment, the area will not attract or retain quality employees.
- Natural assets should be quantified as so many businesses rely on them.
- Disagree with the approach to economic growth. Fails to prioritise the low carbon economy, concept of 'sustainable growth' not enough.
- We need a green economy: to have a regenerative culture, sustainable resources, self-sufficiency and investment into green jobs and community projects. Education on green economy and the vital role it plays. We also need public investment into commercial projects.
- We all need to protect the area for the long term.

Defence Estate

Defence Infrastructure Organisation (DIO)

- The DIO is seeking to establish the foundation for the 'right-sized' military estate of the future. A number of MOD sites which are surplus to military requirements and have been identified and scheduled for disposal. This 'means that the remaining Estate is of increased value to Defence and it is of critical national importance that these sites are able to operate without hindrance and that further development is allow at these sites to meet operational defence requirements.
- Dorset is home to a number of key MOD assets. MOD would suggest that the positive role defence uses play in Dorset and the essential role they play in the operational defence and security of the United Kingdom is recognised and reflected in the plan in order to ensure the continued protection of MoD assets in Dorset and support for any additional development required to meet operational demands in each of the sites in line with paragraph 95 of the NPPF (2018).

1.2. The supply of employment land and premises

Paragraph 5.2.2 - 21,000 new jobs (FTE)

Public response

- The target of 21,000 FTEs should be linked to the number of new dwellings planned in settlements where the new employment sites are situated. Achieving this linkage would contribute to the sustainability of development.

Paragraph 5.2.2 - Key Challenges

Town and Parish Councils

- Need to make clear provision for enabling revisions to the approach to take account of the implications of Brexit and the pandemic.
- The section on the economy lacks a clear focus or strategy in terms of any spatial or industry-type focus, simply referring to growth across all industries (5.2.2) and the need to better understand the fall-out from Brexit and Covid-19.

Developers/Landowners/Agents

- There will need to be flexibility built into the policy to take account of changes related to Brexit/Covid-19 pandemic.
- Can see the reasoning behind the delay in purchasing an up-to-date model, not only in respect of the impacts of Brexit, but also now because of the impacts of Covid 19. The plan should however be underpinned by evidence.

Public response

- The estimate of employment need should be revised to take into account of Brexit, Covid-19 and changes to the Use Classes Order.
- The repercussions of the Covid epidemic on working patterns needs to be addressed.
- Workspace evidence is now out of date - particularly having regard to the Covid-19 pandemic.
- There is no recognition of how employment is going to change, in particular after Covid, and for a small county like Dorset we need to be looking at future green and digital economies as well as more land for the local food economy and food security.

Approach to the supply of employment land and premises

South Somerset District Council

- Welcomes the local plan strategy for encouraging sustainable economic growth at appropriate locations.

Dorset Climate Action Network

- Need throughout the county for modern, well-equipped and flexible workspace suited to use for offices, laboratories and workshops or light industry.
- Welcome the proposals in the Local Plan for zoning of land for workspace development in many first and second-tier towns.
- Existing and new enterprises may need access to modern energy-efficient workspace, created either by retrofit of existing buildings or by new build.

- Importance of location of employment development close to public transport routes and serviced by high quality broadband connectivity and electric charge points.
- Suggestion that stimulus to economic innovation can be provided by business ‘hubs’ containing shared workspaces and offering opportunities for skills training, ICT access, collaborative ventures and sharing ideas, initiatives and resources with links to investment.
- Suggestion that zoning for employment development is not enough – reference to report by Rural Enterprise Group of Dorset LEP – majority of sites created in the last 20 years depended upon investment by public authorities in infrastructure or other elements.

Portland & Poole CPRE

- The promotion of isolated employment sites (Dorset Innovation Park) suggests that general infrastructure issues are being ignored.

Developers/Landowners/Agents

- The 131ha figure in the Workspace Strategy represents a ‘no flexibility’ scenario, while the 151ha caters for a high growth scenario and, in any event, helps to build in choice and range.
- Employment uses in mixed use scheme should complement and be compatible with the wider scheme/allocation.

Town and Parish Councils

- Paragraph 5.2.3 appears to be the best approximation of a strategy yet there is no policy per se to express this, potentially relying on the suite of DEV policies which are settlement and site-specific based on the land opportunities identified.
- More needs to be done to encourage new businesses to move into other areas not just built-up towns.
- Suggestion that large-scale business parks are not the only job opportunities.
- Concern with additional car use driven by out of town employment sites.
- The jobs forecast is not supported by a chapter on economic strategy to justify it.
- Concern over the achievability of sustainable economic growth and the future prosperity of Dorset.
- Significant and sustained increase in productivity must not come at the expense of the environment.
- The key to sites is to provide investment/incentives to attract appropriate businesses to create the necessary employment.
- Concern with assumption that economic growth will come from existing and expanded ‘Employment Sites’ - employment is becoming far more diverse being based at home or in small units associated with the needed agricultural diversification.
- Concern with skewing of housing making it adjacent to planned employment expansion without any genuine indication that such expansion will be realised.
- Commercial planning applications are considered without a “presumption of sustained development”.
- Encourage small rural industry and locate large scale operations with HGV’s in appropriate industrial locations.
- Improved provision of full fibre Broadband. This will support working from home and reduce commuter traffic (ref 1.3.26).
- Lack of policy expressing the need to support the right types of economic development in the right locations.
- The general economy policies simply focus on the protection of existing sites.

Public response

- Respondent identifies opportunities around encouraging new businesses to locate in town centres.
- SHELA has not assessed sites for employment uses.
- Council should support small and medium sized businesses with appropriate allocations in the local plan.
- The allocations for small and medium sized businesses should include sufficient parking and loading space.
- Plan should provide hundreds of ha of employment land to support small local businesses.
- 50ha of employment land should be within residential areas as mixed uses to reduce commuting.
- Need to have plenty of employment land and buildings available to attract businesses and not just build houses for people to keep commuting.
- Plan needs to include robust strategies to attract employers to centres of significant population growth.
- Employment land is vital for the rural economy to be sustainable.
- The council should identify sites suitable for "remote work hubs" to provide shared facilities for remote workers and easy-access locations for new start-ups; hubs should be situated outside towns, close to good transport links, with good internet and tele-communications; hubs to provide office facilities, infrastructure and catering.
- Will different working arrangements result in a lesser need for employment space allocation?
- Importance of providing fibre broadband for people to work from home.
- Must capitalise on changes to ways of working and welcome young people who love our environment and can now work remotely.
- Support anything that improves the diversity of visitors and residents.
- Section needs to be completely reassessed as there is no sense that employment will change radically in the next 20 years.
- Assuming economic growth will come from existing and expanded employment sites is 20th century thinking as employment is now becoming far more diverse. Encourage businesses to relocate into town centres (rather than building 'employment sites') would relocate businesses at the heart of the community where mutual reinforcement is more likely than on isolated locations.

Paragraph 5.2.4 - 'Flexible policies for the rural areas'

Town and Parish Councils

- Despite the statement that "Flexible policies for the rural area have been included instead of allocations in and around other settlements" it is unclear what this means; DEV7 (which operates outside of any development boundaries) does permit new employment, tourism, educational / training, recreational or leisure-related development. Does this therefore mean that general employment would be acceptable basically anywhere and at any scale (subject to environmental policies)?
- Clarification needed in relation to the statement at paragraph 5.2.4 - "Flexible policies for the rural area...".
- The Plan should support the many existing local rural businesses to provide sustainable improvements including those which address climate change issues. Broadband and internet connectivity issues remain in the rural areas, this has been ignored.

- Plan does not demonstrate a clear commitment to support the more rural local businesses and communities.

Developers/Landowners/Agents

- Needs much more on rural enterprise and innovation - feel that the draft Plan needs much more, in fact a whole sub-section and a new policy, on rural enterprise and innovation.

Dorset Climate Action Network

- Rural areas should remain rich in small and medium-sized enterprises.

Public response

- The need for large scale employment sites is decreasing. Vital that employment is provided within rural communities by smaller units.
- A significant barrier to employment is often the cost of transport to sites from rural areas. Land for new employment space should be distributed across all of Dorset and the local plan should highlight the need for space in rural areas.

Paragraphs 5.2.5-12 - Protecting employment sites

South Somerset District Council

- Notes the reference to the new Use Class E and the recognition that the changes are not limited by location, and affect buildings within the relevant uses wherever they are.

Cranborne Chase AONB

- Concerned about agricultural buildings being taken over for businesses that are basically unrelated to the farm or the local community, and merely using the site as a convenient and cheap location. Particular concern about storage and distribution which can mean large HGVs negotiating narrow lanes and then fleets of small vans radiating in all directions, with the traffic disrupting the tranquilly of the AONB and damaging the roadside verges.

Dorset Climate Action Network

- Much land previously zoned for employment has subsequently be switched to housing, on the alleged grounds of non-viability for creation of workspace, despite the clear demand for workspace.
- Land zoned for workspace should be rigorously protected for that purpose - planning authority should work closely with the commercial sector to secure the development of workspace/public funds necessary.

Bridport Local Area Partnership (BLAP)

- We are unsure whether the new use class E will permit the conversion of offices and light industrial buildings into retail premises. It could offer a way to get around the sequential test for retail development, a concern.

Town and Parish Councils

- While agreeing in principle with the objective of permitted development rights providing low cost housing in commercial premises, concern that the council will have no control over the types and quality of development.

Public response

- The council should resist the loss of employment land to other uses.

- There will no doubt be exceptional cases where a derelict employment site with no hope of reinstatement should be let go and given over to other uses.

Paragraph 5.2.13 & Figure 5.1 - Definition of employment

Sport England

- Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.
- It is estimated that there is a total of 3,332 people employed via sport in Dorset with an economic generation of £118.1 into the local economy. There are wider values as well in saving £147.8m in the health economy and generating £40.5m in wider spending with a further £55.5m in volunteering. Looking at statistics for transport and storage employment in 2019-20 in Dorset the figure is 2,500 that is 832 less than in sport!

Aldi

- Retail is an important contributor and critical element to the economy and employment generation and provides community benefits.
- Introducing a store to an area reduces the need to travel further afield benefitting the environment, retaining expenditure in the area and increasing likelihood of spending taking place in other local facilities.
- Stores generate jobs and training opportunities for employees.
- Development of new stores contribute to the construction industry, which benefits the economy and employs local contractors.
- Policies in respect of economic development should be amended to reflect the benefits an Aldi store has to the economy, the high quality nature of retail jobs, and the other investment benefits a new store or improvements to an existing store bring to an area.

Town and Parish Councils

- The description of employment in the plan is far too limited and does not fully take into account the way in which employment is changing.

Developers/Landowners/Agents

- Welcomes the flexibility provided by the definition of 'employment uses' in the emerging plan.
- The council should consider revising the definition of employment uses provided in the emerging plan to reflect that in the adopted West Dorset Local Plan.
- Agreement with suggested definition of employment, subject to changes; Listed uses are too narrow and with too great a focus on existing urban commercial uses; Rural employment, which is by its nature much more varied, needs to be explicitly recognised - should be a more general focus on jobs and economic performance which would allow for unanticipated uses to come forward where there is demand.
- Definition of employment should be consistent with Use Class E categories.
- Aspiration for more flexibility, recognising that jobs can be generated across a wide array of 'non-B-use' community and commercial activities.

Inspired Villages (Matchams Stadium)

- Suggestion that care villages usually employ between 30 to 37 part time and full-time employees and additional staff members and employment generation through supply chain and development.
- A majority of those employed at a retirement village are likely to be drawn from the local economy, offering significant opportunity for wealth generated to have direct and indirect impacts within the local area.

Public response

- Not clear why some uses which provide employment for people aren't classified as employment.
- With our food security being more uncertain since we left the EU and many people now realising how little of our own food we grow, it is time to rebuild these skills and opportunities for the future. West Dorset is the ideal place to do this along with new technology and digital systems that can enhance new employment.
- Management and enhancement of all aspects of the County's natural, historic, architectural and scenic heritage and the nature recovery programme is already, and will continue to be, a significant source of employment. Eco-tourism.
- Lack of reference to 'training' - more thought will be needed as to how this area of Dorset can develop research, training, and learning new techniques.
- Sustainable construction - Bridport might be able to attract high value-added work and the employees to manage and work in such businesses. The Town is not really sustainable on the basis of processes drawn from the past.
- New outdoor pursuits businesses and shared working spaces are important.
- Concern with impacts of waste related employment uses.
- More manufacturing jobs.
- Large gym with all benefits.

2. Policy ECON1: Key employment sites

2.1. Approach

Key Employment sites

Historic England

- Historic England notes that key employment sites have been identified in Appendix 6. Uncertain if this process has considered the potential impacts on the historic environment. Concerned to ensure that proportionate heritage impact assessment work has been undertaken to assess the suitability and capacity of all allocated sites for development as well as the need for any site-specific policy criteria.
- Further information can be found on the need for an up-to-date and robust evidence base and site selection methodology in GPA1: The Historic Environment in Local Plans (2015) and HEAN 3: Site Allocations (2015).

Purbeck & Poole CPRE

- The impacting effect upon the proposed Local Plan created by the Dorset Enterprise Partnership require explanation and justification since it is perceived that associated initiative are simply encouraging existing business to move around rather than fostering new business.

Town and Parish Councils

- Agree that key employment sites should be protected.
- Symondsburry Parish Council support the policy approach outlined in Policy ECON1 of the emerging local plan.
- There is no clear evidence assessing the various sites which has led to anomalies for example, the key sites include some quite small sites within the towns (eg Johns Road in Wareham at 0.3ha) and villages (eg the proposal for a key employment site of 0.7ha in Bere Regis) whereas other village / rural sites (eg Milborne St Andrew business centre (1.7ha)) do not even feature as an employment area (key or not).

Public response

- The definition of key sites is based on the historical segregation of employment and residential uses, it is more important that such sites are safeguarded for future growth and development. The Local Plan should consult with a good sample of businesses to get a view of future need and have strong policies to protect all types of site, key or otherwise.
- Respondent considers that the economy and employment opportunities in different types of work may start to diversify - in response the council might need to reconsider its approach to defining and safeguarding key employment sites.

The appropriateness of the proposed use

Town and Parish Councils

- Clarification is sought on whether ECON1 applies only to light industrial, ie not to other classes including retail, offices and other employment sites.
- II: While acknowledging the need to find alternative commercial uses, as worded the statement risks the loss of commercial sites to non-employment use, to which the Council is opposed unless part of a fuller masterplanning exercise and with consideration of compensating provision of employment land elsewhere.
- Welcome the changes to Class E of the Use Classes Order.

Developers/Landowners/Agents

- Policy should enable mixed use schemes that demonstrably meet local housing and community needs.
- Wording should align with revised Definition of Employment and Use Class E categories while still permitting alternative development demonstrating substantial community benefits outweighing retention for employment.
- The policy or the supporting text should provide guidance what on evidence an applicant would be required to provide to support an application for loss of an employment site to non-employment uses.
- Concern with the restrictiveness of the approach given that the plan seeks to significantly over provide employment floorspace against evidence of need.
- Policy is over restrictive and does not reflect the NPPF's more flexible approach to employment sites and review of old allocations, and its provisions relating to the effective use of land (see paragraphs 81, 117 and 120, in particular).

Public response

- There should be clear parameters of distance between bad neighbour uses and residential areas.
- Bad neighbour uses should not be located next to low income houses.

- Being a difficult to accommodate use should not necessarily mean it is enabled.
- The need for waste management infrastructure should connect with the adopted waste plan and the term 'need' should be further defined.
- Adverse impacts on neighbouring uses from key employment sites, especially those nearby uses which are employment generating should not be ignored within the emerging policy - suggested amendment to part i. of the policy.
- Consideration of proximity to town centre should be limited to public amenity access issues, not to waste infrastructure.
- Object to the inclusion of a wider range of employment uses on key sites, strong limitations are necessary.
- Stronger protection of key sites is needed. Policy needs to recognise the characteristics of the commercial property market and build in stronger tests for market demand.
- To resist the gradual change of use to residential uses a masterplan should be developed for each key site, particularly in areas of high housing pressure.
- Agree with not losing any allocated employment sites in the towns to more housing.
- The council should carry out more work on intensification and regeneration of existing employment sites.
- Further details of business/employers who are likely to locate on employment sites - there is a need for well paid jobs in Dorset and small self employed engineers.
- "Key" status should be reserved for business clusters which have proved their worth to the economy by generating revenue and providing employment.
- Protection for retail would be needed but not too restrictive.

2.2. Policy

Criterion I

Town and Parish Councils

- Policy criterion I - The word "appropriate" is not specific enough and, recommend that clear criteria should be identified here.

Criterion II

Public response

- Criterion ii should restrict alternative uses to other appropriate business use classes. The local plan should recognise that some buildings are suitable for a variety of uses and residential development should be resisted.

Additional criterion

Developers/Landowners/Agents

- The wording of the policy does not sufficiently manage the potential impacts of development adjacent to their boundaries. An additional point to the policy should be added after point 3 and should read: 'development adjacent to key employment sites which threatens the vitality or viability of the existing and/or future uses will not be permitted. Where consent is given for residential development adjacent to key employment sites appropriate mitigation in the form of landscape buffers and/or boundary treatments will be expected'.

2.3. Should any sites be added or removed from the list of Key Employment Sites in Appendix 6?

Overall approach

Alderholt Parish Council

- No sites should be added or removed from the list of key employment sites in appendix 6.

Public response

- Retain key employment sites.
- General agreement that no sites should be added or removed from list of Key Employment sites.
- Employment sites in Verwood at Ashley Heath, Black Hill, Longmeadow and north of Casa Velha should be identified as "key".
- There is no mention or plans of the other industrial estates in Verwood:- Ashely Heath, Black Hill, Longmeadow and North of Casa Velha.
- Commercial Road Swanage inclusion. Very small scale but potential already.
- Council run day centre at Sandford Lane Wareham should not be defined as safeguarded employment land, or a key employment site, in the emerging Dorset Council Local Plan.
- Respondent queries why the Centre for Creative Arts at Poundbury is not defined as a key employment site.

Bournemouth Airport and Dorset Innovation Park

Public response

- Lack of consideration of Bournemouth airport and Winfrith Innovation Centre in terms of major investment sites in Dorset.

Chickerell, Portland & Weymouth, various sites

Weymouth Civic Society

- We fully concur with the aspirations for Weymouth for a good and thriving economy These aspirations need to be translated into action, to give strong support and encouragement to the development of the employment base.

Steve Hoskins A2A Consulting representing DJ Property Group

- The "expected contribution" data in Appendix 6 fails to identify existing and potential employment sites at: Portland Port, Weymouth Town Centre, Land off Wessex Roundabout Radipole Lane, Land west of Southill, Icen Farm Bincombe, Putton Lane Chickerell.
- Full extent of Stone Firms masonry works should be included within the settlement boundary and the employment site designation to the north.

Weymouth, Dorset Police HQ

Public response

- Dorset Policy HQ should be in list of employment sites.

Wool, Enterprise Centre

Public response

- The Enterprise Centre at Wool should be replicated in major conurbations and should not limit itself to certain sectors of the economy such as manufacturing.

Three Legged Cross, Woodsbridge

Public response

- Don't change list of key employment sites but include Woolsbridge in Verwood section.
- Woolsbridge should be identified in the table as being in Verwood or Three Legged Cross.

Okeford Fitzpaine, Wessex Park Homes

Okeford Fitzpaine Parish Council

- PC would like to see employment opportunities developed from the Wessex Homes site in Okeford Fitzpaine.

Upton, Frenches Farm

Turley on behalf of Wyatt Homes

- Land at Frenches Farm, Upton should be added to the list of Key Employment sites - see accompanying report.

3. Appendix 6: Employment Land

3.1. South eastern Dorset functional area

Holton Heath, Holton Heath Trading Park

RSPB

- We have significant concerns about this site and wish to ensure that it is developed sensitively with regards to its current wildlife interest which includes an SNCI for unimproved neutral grassland (MG5) and supports a greater horseshoe bat roost (a European Protected Species) among other features. We would like the plan to include a policy covering this critical brownfield site.

Historic England

- Historic England notes that Figure 7.3 includes an employment land allocation at Holton Heath Trading Park, which is adjacent to the scheduled Royal Naval Cordite Factory that is also on Heritage at Risk Register 2020. The nearby Admiralty Park is also located here and this allocation covers part of the scheduled Cordite Factory and the associated listed buildings.
- We would welcome further information on how these allocations will affect these designated heritage assets and how associated policy can be used to conserve and enhance their significance and help address the reasons for the scheduled monument being 'at risk'.

Wool, Dorset Innovation Park

Nuclear Decommissioning Agency

- The Nuclear Decommissioning Agency promote allocation of the Winfrith Nuclear Licensed Site for employment uses and heathland.

Purbeck & Poole CPRE

- The promotion of isolated employment sites (Dorset Innovation Park) suggests that general infrastructure issues are being ignored.

Public response

- Dorset Innovation Park - large companies would view this location as inadequate due to being an hour from a national motorway, only 2 convenience stores in the area, reduced train timetable.
- DIP and Bovington are not key employment sites as they do not employ many people and won't sustain the number of people proposing will live in Wool; with more people working from home, no need for office space but they'll take advantage of cheaper 1st five years and then go elsewhere, water logged land may restrict this from lasting 5 years. assumptions about business growth is now outdated due to the pandemic, trains to Wool may reduce due to this.
- DIP does not fulfill the requirements to be a Key Employment Site as it does not provide employment to the local community it is specialist in nature.

Upton, Factory Road

Public response

- Appendix 6 - Employment site on Factory Road, Upton serves more than just Upton creating additional congestion.

Swanage, various sites

Swanage Town Council

- Swanage town council - supports inclusion of Victoria Avenue Industrial Estate, Prospect Business Park and Kings Court Business Centre in list of key sites; status of Kings Court, however, should remain as set out in Policy KCD of the Swanage Local Plan.

Wareham, various sites

Wareham Neighbourhood Plan Steering Group

- Key employment site protection should be removed from the south side of Johns Road Wareham; Can't be described as key; numbers employed are small and site is run down; other alternative sites locally; may be more suitable for housing.
- Boundary amendment to key site at Sandford Lane Wareham; exclude Purbeck Connect building and car park and adjoining residential building; existing use likely to be relocated; potential for housing, particularly affordable housing.

Wareham, St Johns Road

Public response

- Johns Road Wareham should not be defined as a safeguarded employment land, or a key employment site, because of its size, the numbers of people employed and because it is rundown.

- Johns Road Wareham is well placed (next to bus stop and train station) for intensive residential development.
- Dorset Council to consider releasing the south side of Johns Road from designation is a key employment site to allow re-use/re-development with dwellings.

3.2. Central Dorset functional area

Dorchester, various sites

Dorchester Town Council

- Supports the approach for the following Employment sites:
 - Marabout/Grove, Poundbury West, Railway Triangle
 - Alington Industrial Estate
 - Casterbridge Trading Estate
 - Poundbury Mixed Use

Chickerell, Lynch Lane Industrial Estate

Public response

- Concerns in relation to an inadequate provision of car parking for employees at Lynch Lane Industrial Estate, a proposed key employment site within the emerging Local Plan - having an adverse impact on the local area, including Littlesea Holiday Park.

Chickerell, Link Park

Public response

- The map needs revision to include the full extent of developed area at Link Park.

Portland, Portland Port

Portland Port

- This policy is relevant to the Port. Would welcome a dialogue to ensure the maritime opportunity of a deep water commercial port offers to the area.

Public response

- Portland - The last time I visited the derelict range site on Portland's East Weares, it was home to a group of large goats. This site is not appropriate for industrial development and should be left to the wildlife - and goats.

Crossways, various sites

Crossways Parish Council

- Supports safeguarding of employment sites in Crossways, but does not consider that the designation of key employment land to the south of Warmwell Road is justified.
- Crossways Parish Council does not think Oaklands Park Corner is a suitable location for employment uses (having regard to the relationship between the site and park home caravan site).

Weymouth, Mount Pleasant Business Park

Public response

- The Council has allowed out of town retail development at its Weymouth gateway site and large areas of both office and industrial space lie empty at Poundbury.

3.3. Northern Dorset functional area

Sturminster Newton, North Dorset Business Park

Aldi

- North Dorset, in particular Sturminster Newton - the council needs to undertake further consideration of the potential uses for allocated employment sites, recognising that retail is an important contributor and critical element to the economy and employment generation and should be supported.

Shaftsbury, Land south of the A30

Pegasus Group on behalf of Persimmon

- Objection to the inclusion of land south of the A30 (SHAF4) as a proposed employment site.

Persimmon

- SHFT4 identified on policy map has had planning application submitted and now subject to appeal - therefore object to identification of this as a proposed employment site on the map.
- We object to the identification of land to the south of the A30, Shaftesbury as a proposed employment site under Policy SHFT4 and on the Policies Map of the draft Plan.

Sherborne, Land south of Bradford Road

Public response

- Land south of Bradford Road in Sherborne cannot be accessed.
- Land south of Bradford Road in Sherborne is closely related to a school and homes.
- There is an issue with volumes of traffic using roads are land south of Bradford Road in Sherborne.
- The proposed employment allocation at Sherborne should be added to the list of key employment sites

3.4. Western Dorset functional area

Bridport, various sites

Symondsbury Parish Council

- Symondsbury Parish Council consider that 'existing local plan key employment sites' and those defined on MAP4 of the Bridport Area Neighbourhood Plan are retained/maintained.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Status of existing WDDC Local Plan key employment sites and those in the BANP MAP4 should be maintained.

Bradpole Parish Council

- The safeguarding for employment sites in Bradpole Parish Council area in the adopted West Dorset, Weymouth & Portland Local Plan should be carried forward into the Dorset Council Local Plan.

Public response

- Highways impacts of employment sites in Bridport - relevant for vehicle routes within St Michaels Trading Estate and along B3162 along West Road and West Allington leading to the Town.

Bridport, Vearse Farm

Public response

- It seems highly questionable to grant “key” status to Vearse Farm, currently still fields with outline planning permission, unlikely to go ahead in the form envisaged.
- Vearse Farm should be removed from the list.
- Verse Farm only has outline planning permission and has seen not a sod turned. It is not valid to give an ‘aspiration’ key status.

Bridport, St Michael’s Trading Estate

Public response

- Consider adding St Michael’s Trading Estate to the key sites - a busy and industrious location of dozens of micro-businesses, significant contribution to the area’s financial wellbeing, needs protection from inappropriate development.

Beaminster, various sites

Beaminster Area ECO Group

- Secure the development of well-equipped flexible workspace on the remaining zoned ‘employment’ land at Tunnel Road and/or in the town centre.

Beaminster and Villages Local Area Partnership

- Beaminster Town Council tried to preserve the employment land no longer required by Clipper Teas but was overruled. Another site was offered but nothing has happened there either.

Public response

- The land identified for employment use in Beaminster (BEAM 2 and BEAM4) should not be used for businesses that require large warehouse type buildings due their prominence in the landscape and in an AONB. These sites have a high visibility on the approaches to the Town from the North and West.

Lyme Regis, Uplyme Road Business Parl

Lyme Regis Parish Council

- Support the retention of ‘Key Employment Site’ status for the Lyme Regis Business Park off Uplyme Road, may support some of business park for residential if it was relocated to more suitable location.

4. Policy ECON2: Other employment sites

4.1. Approach

Approach to 'other employment sites'

The Grove Medical Centre

- Agree with sentiment but there is no direct link to the provision of community services such as health and education also providing employment opportunities.
- There is no set priority to prioritise infrastructure projects that provide employment as well as community benefit over others.

Bridport Local Area Partnership (BLAP)

- This policy needs re-wording, so it does not over-write the existing employment sites policy (EE1) in the BANP neighbourhood plan. In particular, it must not allow re-development for other uses on sites which that neighbourhood plan has designated as Important Employment Sites.

Town and Parish Councils

- Support the current approach as outlined in the current wording.
- Whilst small sites within the countryside do not necessarily support the most sustainable patterns, they are a very important source of local employment that supports the rural economy - Their absence from Appendix 6 should not be misinterpreted as having no value.

FSB

- We need planning policy that encourages employment.
- We need to encourage and support start ups and business incubation across the towns; Need a scheme to support new businesses throughout their journey over short, medium and long term.
- Develop and enhance an ecosystem that encourages local supply chains and doing business locally.
- Connecting businesses with young people is critical; Need a public transport infrastructure that enables young people to travel around the county to optimise their opportunities.
- Ways of working have changed and use of technology has accelerated changes during the pandemic; trend of home working likely to continue - need to embrace the opportunities created. Reliable Superfast broadband and public transport infrastructure will be critical.

Public response

- Small employment sites in the countryside can be important sources of local employment and support the rural economy.
- This policy needs to support the development of the 'green economy.
- The policy needs to recognise and help address the overarching climate emergency.
- In all cases it is vital that employment provision is provided at or before new housing development.

Paragraphs 5.4.2-7 - The appropriateness of the proposed use

Town and Parish Councils

- Most small rural businesses prefer to be in a complex where there are shared facilities.

- Any proposed use must seek to increase the overall carbon efficiency compared with the existing use.
- Significant concerns that commercial land will be lost. Protecting a site's use for employment is often not in the best financial interests of developers.

Paragraphs 5.4.8-9 - The acceptability of the scheme

Historic England

- Historic England welcomes the supporting text at 5.4.8, which recognises the need to consider the impacts of development on other employment sites on landscape and heritage. However, we consider that this consideration should be reflected in the wording of part II of Policy ECON2 itself.
- Would also welcome flexibility in the use and redevelopment of other employment sites where this would help facilitate finding a long-term solution for heritage at risk. We would be pleased to see this matter covered in the supporting text (5.4.8) and part I of Policy ECON2.

Town and Parish Councils

- The wording used in part ii) of the policy is not as clear as the supporting text at 5.4.9 ie: Development which would prejudice the [ongoing] efficient and effective [employment] use of the remainder of an employment site will not be permitted - should amend.

Public response

- Employment development shouldn't be restricted because of the impact on the highway network without considering mitigation.
- Impact on the highway network is mentioned for employment but why is this not a concern for housing developments?

Paragraphs 5.4.10-12 - Information required to support proposals

Town and Parish Councils

- There is no guidance as to what a 'suitable period of time' may be for the marketing of any premises to show that these are not viable. Some guidance (for example, specifying at least 12 months) would be useful to avoid inconsistencies in the general approach applied.
- Paragraph 5.4.12 – query use of the phrase “may be sought” rather than “will be sought”, and the reason for the weakening of the requirement.

Public response

- Development that does not involve, or deliberately excludes, an employment site should necessitate submission to the Council of details of marketing, pricing and offers rejected, as spelt out on the final bullet-point of paragraph 5.4.12.
- The marketing of employment sites by housebuilders is often intentionally poor.

4.2. Policy

Criterion I - uses

Town and Parish Councils

- Agrees with the approach but also invites consideration that the policy should also be extended to Retail (E) class premises.

Additional criterion

Public response

- Replacements for lost employment sites are rarely seen and developers argue for an increase in the housing proportion on mixed use sites. To retain potential job opportunities the local plan should propose measures that require developers to replace lost employment sites of all types and resist the slow erosion of mixed use locations.
- In light of changing patterns of home-working, retail, and addressing climate change, the policy should be extended to include the possible loss of employment sites in all business use classes, in order to allow for the use of derelict sites that show no probable opportunity for reuse.

5. Policy ECON3: Town centres and retail development

5.1. Approach

Overall approach

Town and Parish Councils

- Support approach.
- Pays no attention to the climate emergency.

Developers/Landowners/Agents

- Support policy objective to protect and enhance existing town centres.

Public response

- Disagreement with approach.
- Retail or other infrastructure should always reuse the existing provision as much as possible.
- There should not be any further large supermarkets built on any greenspace or Green Belt land.

Paragraph 5.5.2 - Changing nature of town centres

Dorset Climate Action Network

- Endorse the reference in the Plan (para 5.5.2) to “the need for town centres to be redefined and adapted to support a greater diversification of uses”.
- Town centres can contribute to enhancing quality of life while reducing greenhouse gas emissions, making good use of resources and reducing adverse impacts on wildlife.
- Council should work with town and parish councils and chambers of trade to clarify the potential for regeneration and the resourceful use of ‘pocket sites’ and unused floor-space in town centres for residential or other uses.

Dorset Action (People’s Assembly)

- Plan does not take account of the changing nature of our high streets.

Town and Parish Councils

- Concerned about struggles on town centre, including increased charity shops and estate agents.
- Need to tackle increasing number and length of empty premises.
- Need for ventures developing all aspects of green energy.
- Impact of home working on town centres.

- The policy should promote non-retail and leisure uses to add value to town centres competing with online and out-of-town shopping. The policy should consider how it can help convert empty shops to community space, even if only temporarily.
- The Plan needs to allow for growth in the town and create a living/working community.
- Support for protection of town centres; damage from online and out-of-centre shopping can be expected. Weymouth needs strong support.

Public response

- Repositioning and adaptation of town centres (and other retail hubs) to the rapidly changing circumstances following Covid-19 should be an urgent priority.
- Town centres are more than shopping hubs.
- Concern with town centres that are effectively through routes - such as Dorchester.
- Importance of placement of cultural venues. A central arts centre would be a key feature with open spaces as well as the crowded shopping mall.
- Retail practices have changed - out of town and online shopping is now the norm and will increase.
- Agree in principle but without asking communities what they want/require, this section is incredibly vague. Business rates, if within the Council's remit, must be reviewed.

Paragraph 5.5.8 - Peel Centre, Yeovil

South Somerset District Council

- Welcomes the local plan strategy for encouraging sustainable economic growth at appropriate locations. We note the reference to the new Use Class E and the recognition that the changes are not limited by location, and affect buildings within the relevant uses wherever they are.
- We are aware that existing outlets at the Peel Centre, adjacent to Yeovil are likely to fall into Use Class E and will therefore be able to change between uses within Class E unless there are restrictive conditions in place.

Bradford Abbas PC

- No reference is made to the Peel Centre which sits within the Parish between Yeovil and Sherborne. As a retail site it is probably at capacity with one medium term vacant unit. But there is vacant land for future expansion. Issues to be addressed are change of use to leisure, types of retail (currently non food) and traffic congestion, especially when Yeovil is blocked up. More broadly we question whether more thought should be given to the continued decline in demand for retail space, both on the High Street and out of town.

Town Centre Parking

Dorset Action (People's Assembly)

- Re-think use of car parks. Will be less need for them if fossil fuel powered cars are to be eliminated by 2030. Could be covered with PV solar array.

Town and Parish Councils

- The policy needs to link to parking provision.
- Car parks are contenders for redevelopment, however in rural communities which have poor public transport require these.

Future Town Centre Need Forecasts

Aldi

- The council should carefully consider the existing retail offer of particular town, and the need to provide additional provision to meet the ever-changing demands of existing and future residents and the retail market.
- Aldi wishes to increase representation in Dorset and invest significantly in the area. It is keen to work with the local authority to secure representation in other key target towns in Dorset. It considers that opportunities for further foodstore provision within the area to meet the demands of existing and future residents, and generate employment opportunities should be supported and created.

Paragraph 5.5.7 & Figure 5.2 Network and Hierarchy

Network Rail

- Many principal centres have railway stations that may have a role in bringing people in from the catchment area to that centre.
- Sequential approach to third tier is in line with previous accessibility standards which tried to design bus routes so as many homes as possible were within 400 metres of a bus stop.

Cranborne Chase AONB

- The AONB notes figure 5.2, that no local centres are proposed in this AONB. That role falls to Blandford Forum, Gillingham, Shaftesbury and Wimborne Minster.

Town and Parish Councils

- Inconsistencies in treatment of large villages, e.g. how to Bere Regis and Piddletrenthide vary, should settlement strategy and retail hierarchy align?
- Bridport Town Council - Consider aligning policies for Bridport town centre with the Centre of Bridport area as defined in the Bridport Area Neighbourhood Plan.
- Dorchester Town Council - The retail parade of shops in Maud Road, Dorchester should be recognised as a local centre. How will mixed use approaches at Poundbury, particularly Buttermarket and Pummery Square, be protected?
- Lyme Regis Parish Council - supports retaining status in retail hierarchy.
- Portland Neighbourhood Plan sets out a rationale for the centres on Portland. All our centres have been in decline but we consider that with increased number of visitors plus more home working they all have opportunities. Castletown has historic value and is fast becoming a visitors' area and centre of economic activity. This is not considered in the plan.
- Milborne St Andrew Parish Council - Inconsistencies in the treatment of large villages and whether these should perform the role of a local centre (Figure 5.2). Surely in light of the settlement strategy it would be appropriate to include all villages with Tier 3 status within this list.

Developers/Landowners/Agents

- Agree with the designation of Sturminster Newton as a Town Centre within the hierarchy of centres.
- Extra footfall and additional investment from the North Dorchester development would be of considerable benefit to Dorchester town centre.

Public response

- Agrees with hierarchy.
- Support for town centres, not for out of town shopping centres.
- No additional centres should be added.
- Chickerell has two centres - Chickerell Village Centre and Charlestown, both have shops with POs. Amendment required
- Disagree, although Beaminster is smaller than other towns in the Network and Hierarchy of Centres, Beaminster is a market town with a town centre. However, we do not understand the significance of the categorisation.
- Figure 5.2 appears to ignore retail at Kingsmead Business Park.
- Town centre hierarchy not justified with evidence or local engagement.
- Figure 5.2 Add Maud Road Dorchester as a local centre.
- Failed to designate an area of Swanage town centre for entrepreneurial start-up businesses.

Paragraphs 5.5.9-13 - Sequential approach

Sport England

- Sport England's Facility Model appropriate for locating leisure proposals such as leisure centres rather than sequential test.

Public response

- Out of town retail development should only be considered if sufficient justification is provided to the Council and the public - so the real consequences of such establishment would be evaluated.
- Would be retrograde for the Town Centre to be stripped of active outlets where customers have traditionally circulated in favour of 'out-of-town' shopping.
- Do not understand the significance of the categorisation. The Sequential Test is surely the same regardless of the size of the centre?

Transport/traffic

Town and Parish Councils

- Any new development must be well served and accessible by sustainable modes of travel eg direct cycle and walking routes.
- The impact on the highway network must be acceptable, development has to be on a scale suitable for the town.
- The lack of public transport highlights the need for more employment opportunities in the town.
- Congestion on local roads can be exacerbated during the holiday season.

5.2. Policy

Criterion V

Historic England

- Support the policy; Historic England welcomes criterion V in Policy ECON3, which allows flexibility in the location for certain development types. This can be beneficial for heritage at risk.

6. Policy ECON4: Town centre impact assessments

6.1. Approach

Overall Approach

Town and Parish Councils

- Support the current approach as outlined in the current wording.
- Impact assessments should include carbon/emissions impact.
- Should be reviewed in light of the changes occurring due to the pandemic and recent trends.
- Post Covid, more people will want to work from home – more data will be needed about this new economy.
- Policy is interpreted as support for the West Moors Library.

Developers/Landowners/Agents

- Support objective to protect and enhance existing town centres. The extra footfall and investment from North Dorchester (DOR13) would benefit Dorchester town centre.

Public response

- Agreement with the approach.
- Local business opportunities are valuable.
- Need for assessment of impacts on town centres in relation to internet shopping, covid-19, Brexit, motoring and parking habits.
- Vision of town centre regeneration and protecting town centres needs to be revisited in the post Covid era. A new concept is needed. Retail sector is unlikely to recover in the same shape. Scope for experimental uses while the new shape is emerging.
- Concerns with changing use classes, and impacts on town centres and attractiveness for public.

Figure 5.4 Local impact thresholds

Aldi

- The council should carefully consider the floorspace thresholds set out in Fig 5.4 to ensure it does not stifle potential development.

A2A Consulting on behalf of D J Property Group

- The Local impact threshold (Gross floorspace) hierarchy position of 300 m² for Dorchester and Weymouth is considered too low – 500 m² is more realistic.

Bridport Town Council

- Consideration should be given to the floor space 'triggers' for an impact assessment. 300m² is considered too large in the Bridport/ West Bay context where 91% of retail units fall below the government definition of small.

Dorchester Town Council

- Dorchester town centre is increasingly unable to sustain even modest impacts of new out of town retail development.

Public response

- There is no apparent logic to how the locations in the Local impact thresholds table (Figure 5.4) have been arrived at. Large towns such as Swanage have a 200m², West Bay 300m², Ferndown and Wimborne 1000sqm.
- Figure 5.4: I don't understand how these figures have been determined/on what evidence so that, for example, Ferndown and Wimborne have the highest thresholds? It needs to be explained better.
- Increase local impact threshold for Dorchester and Weymouth from 300m² to 500m².
- Vearse Farm should be subject to an impact assessment, particularly the impact of additional traffic.

Paragraph 5.6.4 - Adverse Impacts

Public response

- Paragraph 5.6.4 This needs to set out, at least, some examples of what are considered to be adverse impacts? Is, for example, the need for parking included (out of centre vs in town; so that development in town may actually have a worse impact)?

6.2. Policy

Criterion II

Dorchester Town Council

- The word 'significant' should be removed or carefully defined.

7. Policy ECON5: Management of centres and primary shopping areas

7.1. Approach

Changing shopping patterns

Aldi

- It is important to consider what particular retailers can bring to the local authority area as the approach taken by retailers will be different and depend on their trading model.

FSB

- Not recognised that each town is distinctive - they should be showcased individually.
- How does LP link to Economic Recovery Strategy?
- Provide easy car parking and public transport infrastructure that works.
- Promote ShopAppy. Encourage and support towns to build town centre strategies, including integrating physical place and virtual place.
- Encourage uses for large vacant stores. CICs.
- Business rates policy should support charitable opportunities in long term.

Historic England

- The historic character of Dorset's town centres should be mentioned in the text - wording suggested.

Town and Parish Councils

- With the retail market undergoing rapid change this policy needs to be kept under regular review.
- Dorchester Town Council - Need to bring additional footfall to the town centre and also to deliver alternative housing capacity sufficient to remove the threat of DOR13, before any proposals for out of town residential or retail considered.
- Dorchester Town Council - Long term plan for the future of Dorchester town centre, including its key retail spaces and changes in shopping habits, needs to be fully and urgently evaluated and reviewed.
- Bridport Town Council - Consideration needs to be made to align policies that apply to Bridport Town Centre with the area Centre of Bridport as defined in the Bridport Area Neighbourhood Plan.
- Symondsburry Parish Council - Support the policy approach as outlined in the current wording.
- West Moors Parish Council - Town/villages commercial centres need to be protected from residential development, to ensure the continued commercial viability of smaller town centres.
- Weymouth Town Council - Policy should provide greater flexibility for responses to changes in consumer behaviour (reflecting the impacts of: Covid/Brexit/internet shopping).
- Chideock Parish Council - Concern with environmental impacts of internet shopping. The number of large supermarkets should be curtailed and independent retailers supported and allowed to thrive.
- Arne Parish Council - Concerned about the struggles of town centres. Want to see proposals regarding the increasing number of commercial buildings and shops that stand empty over long periods- these are potentially windfall or brownfield sites.
- Arne Parish Council - Concern with numbers of estate agents and charity shops on high streets - a poor fit with the needs of the community. Need for ventures developing all aspects of green energy.

Beaminster and Villages Local Area Partnership

- Town centre development is an issue that is challenging as people's shopping habits have changed.

North Dorchester Consortium

- Supports the policy objective to protect and enhance (and not detract from) existing town centre. The extra footfall and additional investment from the North Dorchester development (DOR13) would be of considerable benefit to Dorchester town centre.

Clemdell Limited

- Evolution of changes in town centres recognised in 5.5.2 is not reflected in section 5.7. Need to support flexibility.

Public response

- Question the strategy adopted for continued retail growth, particularly in the light of the ongoing trend towards internet shopping, hastened by the Covid pandemic.
- Support for policies protecting town centres and neighbourhood facilities.

- A plan that just talks about reviving high streets to what they were is going to fail.
- We want a plan that creates high streets that meet future need.
- Town centres could become leisure hubs supporting those shops that do survive.
- Fails to demonstrate how impacts of declining town centre will work - how will they be repurposed.
- Town centre change will be radical, people will want larger destination centres.
- Online shopping will change the level of footfall and street scene, potentially leading to closure of retail units. Visitors and tourists would be hard to attract.
- Plan should be delayed until impacts of high street decline have been seen - plan makes many assumptions that will soon be irrelevant.
- Policy area needs to be able to be reviewed frequently to reflect changes in retail habits. The ability to deal with 'dead' shops should be included.
- No mention of the impact of the pandemic on town centre.
- The town centre (with reference to Verwood) is small and has nothing to offer for people. One coffee shop, a café and a bar. We need the residents in Verwood to be spending their money in Verwood, not going off to places such as Ringwood and Wimborne because the offer better.
- More shops at affordable rentals to kickstart entrepreneurs.
- New working practices following the pandemic is likely to free up office space within town centres, the respondent suggests that this should be re-used to provide dwellings. New homes in town centres would help to revitalise these areas and make a valuable contribution to housing land supply.

Paragraph 5.7.2 - Retail frontages & mix of uses

Clemdell Limited

- Paragraph 5.7.2 states that Primary and Secondary "Frontages are currently defined for larger centres within the Dorset Council area in the existing adopted local plans and neighbourhood plans", however currently washed over in the Blandford + neighbourhood plan - washes over a large non-shopping area as the primary frontage - potentially sterilises regeneration and removes flexibility.
- The plan should continue the definition of designated frontages to support national policy and the evolution of town centres, as identified at paragraph 5.5.2 of the Plan, and thus be included in ECON5.

Public response

- Should revive town centres with artists and creatives and respondent considers that the council should encourage a mix of uses (retail, workshops and cafes) in town centres.
- Cultural activities should be mentioned in all town centre policies - they are as vital as sport and leisure facilities. Cultural institutions important to economic and social life of towns and should acknowledge this more.
- Needs to ensure we get a diversity of local independent shops, including supermarkets stocking local farm produce, vegetarian and vegan restaurants.
- Paragraph 5.7.2 – agree but planning permission should be made easier to obtain.

Paragraphs 5.7.3-5 - Use class E & Primary Shopping Areas

Historic England

- We welcome the recognition of the importance of active ground floors.

- We also welcome the cross-reference to Policy ENV10 at 5.7.5.

Beaminster Town Council

- The flexibility of Class E under the new Use Class system allows far greater flexibility to change uses. This could work against small market towns.

Symondsbury Parish Council

- Note that the changes to the E Use Class provide greater flexibility and alongside 'active frontages' provides the opportunities for vibrant town centres. Bridport Neighbourhood Plan at HT2 and HT3 to be included as part of the local plan provide a reinforcement of the requirements for an active and successful public realm in the town centre.

Dorchester Town Council

- Changes of use should not be detrimental to primary shopping area.

Bryanston Parish Council

- Doesn't reference or consider the implications of permitted development rights which allow a change in use from Class E to dwellinghouses.

Gillingham Town Council

- Support – particularly with the introduction of use class E.
- Primary and secondary retail frontages should still be defined.

Public response

- Changes to the use class order are significant.
- Local plan does not reference, or consider the implications of, permitted development rights which allow a change in use from Class E to dwellinghouses.
- Town centre retail is in decline - need to make it easier to convert retail to residential and bring upper stories back to residential.
- A new Class E Frontage would replace previous Primary and Secondary Retail Frontages.
- Support greater flexibility in ground floor uses in town centres to reflect market conditions and suggest greater flexibility in upper floors.
- Paragraph 5.7.5 - wording needs sorting out.

Paragraph 5.7.6 - Housing in town centres

Clemdell Limited

- Paragraph 5.7.6 should recognise that the fragmentation of ground floor commercial uses will be increasingly from long term vacancies. Where town centre Listed Buildings were originally houses the Plan should encourage the return to that viable residential use as an alternative to long term vacancy and neglect.

Historic England

- Welcome the promotion of residential uses of upper floor.

Dorset Climate Action Network

- Use of town centre sites, or of vacant floor-space (particularly on upper storeys) can provide housing without incursion on greenfield sites.
- Older people can particularly benefit from dwellings in town centres, very close to the services that they need.

Bridport Town Council

- The use of upper floors of premises in centres for residential purposes is supported but should prioritise delivery of affordable homes.

Public response

- Provide opportunities for local people to live in town centres.
- Supports dwellings above shops and other ground floor uses in town centres.
- Support for use of upper floors of town centre premises.
- Should encourage residential uses in town centres.
- A major focus for the Council over the next few years should be the reconfiguring of town centres across Dorset - decline in retail and potential provision of affordable homes in empty retail locations.
- The community need more job opportunities in the town centre not housing.

Paragraphs 5.7.7-8 - Markets

Bridport Town Council

- The area defined for Bridport Street Market should allow scope for expansion and should draw on the experiences and solutions used during Covid-19 restrictions.

Public response

- More indoor markets should be encouraged.

Town Centre regeneration

Clemdell Limited

- Council should commit to highly valuing the support for the vitality and viability of town centres when evaluating the sustainability of proposed allocations. At present many proposed allocations detract from that national policy purpose.
- Plan should include commitment to identify and encourage regeneration sites within town centres for the full range of town centre uses in all settlements.

Portland Town Council

- More thought should be put into regenerating town centres. High streets should have more focus on experiential activities as a move away from retail, such as museums, galleries, sports facilities, cafes and restaurants, and activity centres for children. Education providers could be present in town centres, which would bring more footfall.

Public response

- Vision of town centre regeneration and protecting town centres needs to be revisited in the post Covid era. A new concept is needed. Retail sector is unlikely to recover in the same shape. Scope for experimental uses while the new shape is emerging.

Parking and access

FSB

- Provide easy car parking and public transport infrastructure that works.

Chideock Parish Council

- Reduced footfall is not just because of internet shopping - lack of parking, high rents and of course high business rates are all factors in high street decline.

Public response

- Why is no consideration given to access to centres and parking facilities?

Flood risk

Wessex Water

- Improvements to town centres must seek to reduce water flow from impermeable areas through SuDS providing multi benefits; existing apparatus must be protected with appropriate easements observed.

7.2. Policy

Criterion II

Historic England

- Add “role and function and character of the centre”.

Criterion III

Historic England

- Add to bullet point one “shopping area and centre and its character;”.
- Add to bullet point two “enhance the vitality and character of centres and to increase footfall are encouraged.”.

Clemdell Limited

- Should acknowledge that national policy encourages ground floor residential uses in town centres by way of prior approval. Thus ECON5(III) “an active ground floor use is maintained or provided” requires deletion.

Criterion VI

Dorchester Town Council

- The words “subject to” undermines the reuse of upper floor spaces and should be removed.

Historic England

- Add “where possible, separate access to the upper floors being provided without comprising the character and appearance of historic shop fronts”.

Public response

- Criteria (vi) - Delete all after “encouraged”.

8. Policy ECON6: Tourism Developments

8.1. Approach

Overall approach

The Grove Medical Centre

- Minimal funding for tourists using healthcare this should be reassessed. Health care provision needs to be considered when tourists become ill on holiday.

Symondsburys Parish Council

- Support the policy approach.

Charmouth Parish Council

- In Charmouth the tourism industry will need to be sustained by maintaining the coastal defences.

Wareham St Martin Parish Council

- Losing the tourist information services in the county is a financial mistake. The money that is generated should be taken into account. It is imperative other methods of delivering these services is found within the locality and supported by Dorset Council.

Beaminster and Villages Local Area Partnership

- Beaminster and Villages Local Area Partnership - The tourism sector tends to be seasonal and is not well paid leading to the workers ending up with affordable but lower quality housing.

Public response

- Agree with approach.
- Visitors must be welcomed, cared for and charged somehow.
- Parking fees need to be seen as a ticket to free and clean loos, rubbish collection and Ambassadors for help/advice.
- Visitors bring money to support local business, so locals have these business all year.
- Visitors will pay for a good 'seaside experience', this needs to be defined and marketed.
- Locals are temporary residents too.
- No tourism related data is provided – day visitors, average stay, holiday cottages, attractions visited, settlements that attract visitors etc.
- Council should have a Tourism Plan with policies to ensure the provision of excellent tourism infrastructure (toilets, information etc) and have an awareness of carrying capacity of visitor attractions.
- Need more creative ways of managing rubbish.
- The infrastructure impact of tourist development is considered, but not the impact of new housing developments on the local centres and surrounding infrastructure.
- Lack of detail about holiday accommodation - should mention where it should be and the nature of it, talk about its relation to transport routes.
- Eco festivals that promote sustainability and help tourism.

Paragraph 5.8.1

Cranborne Chase AONB Team

- Paragraph 5.8.1 - AONBs, unlike National Parks, are not required to provide for tourism.
- Suggestion of removal of permitted development rights on land within the AONB to avoid unwelcome extensions or additions to the tourist facility.

Paragraph 5.8.2

Natural England

- Paragraph 5.8.2. Natural England recommends specific reference is made to schemes that support the diversification of land management to deliver multifunctional benefits to the environment.

Swanage Railway

- The SR's current contribution to the local economy in normal times has been calculated between £ 9 M and £ 20 M, and probably towards the higher end of that range.

Chideock Parish Council

- Tourism accounts for 18% of employment in West Dorset (the largest employment sector) and yet there is very little identifiable help being outlined for supporting this.

Public response

- Policies do not address existing problems stated in section 1 confirming conflict of tourism and environment.
- To prevent an over focus on the tourism sector that might misdirect the focus of economic growth policies, the local plan should use evidence and present the true value and relative importance of tourism to the Dorset economy and its comparative employment opportunities.
- Too much reliance on the plan for tourism to provide employment.

Paragraph 5.8.3

Chard Valley Parish Council

- Paragraph 5.8.3 supported.

Historic England

- Welcomes the recognition of the relationships between Dorset's historic landscape, seascape and townscape and heritage assets with tourism in the supporting text.

Paragraphs 5.8.4-7 - Supporting vibrant and attractive tourism

British Holiday & Home Parks Association

- British Holiday & Home Parks Association - concerns policy would prevent built tourism development outside of town centres when tourism at the coast, countryside and villages are the greatest tourist attraction in Dorset.

Tetra Tech on behalf of Chedington Estate

- Consider the policy is too restrictive and that support should be given to the development of tourism development where there is demand for it - importance of tourism development to the district's economy. Limiting tourism development to the towns and villages in the settlement

hierarchy could damage the tourism offer within Dorset and limit beneficial developments in rural areas.

Blandford forum Town Council

- Existing centres should be the location for any new development. – Tier 2 are 1st choices for this ‘How exactly will ‘vitality and viability’ be promoted – especially in tourism? The decision to withdraw funding for TICs would seem to counter this. What forms might the ‘new development take?’ As a tier two settlement with an emerging trial plan for the town centre, how might DC support such endeavours?

Chideock Parish Council

- Disagreement with the approach that development will only be permitted in tiers 1 2 and 3.
- Tier 4 rural areas are far more picturesque and in most cases much more desirable for the tourist to stay in. Concern with the impact on Tier 4 rural areas falling outside of the wider catchment area.

Network Rail

- In 5.8.4 it is stated that tourist development should take place at the most sustainable locations. In 5.8.5 it is stated that town centre locations are the most suitable for tourist development.
- In 5.8.7 the need for transport assessments and transport plans for new developments that are seeking planning permission is outlined. There may be scope for rail to play its part in sustainable tourism, but this is not referred to. In some parts of the country there have been schemes to encourage sustainable transport to rural tourist destinations such as the Ridgeway Explorer in Oxfordshire and neighbouring counties, and 2 for 1 entry to attractions with rail tickets. Reference might perhaps have been made to potential partnerships between transport operators and tourist attractions to provide alternatives to car based tourism.

Public response

- The idea of focusing tourism on the most sustainable locations in accordance with the settlement hierarchy is not realistic because of the geographic spread of tourist attraction.

Paragraphs 5.8.8-14 - Sustainable rural tourism

Natural England

- Paragraph 5.8.14. Natural England welcomes the support for farm diversification that is in keeping with rural character.

Charborough Estate

- Support paragraphs 5.8.8 and 5.8.14.

Bloombridge LLP

- The Plan needs to provide for sustainable rural tourism too, much of which is locally inspired and very positive in terms of building Dorset’s brand. We therefore support paragraph 5.8.10 on sustainable rural tourism: “Well-designed development of an appropriate scale in suitable locations can spread the benefits of tourism, reduce the impacts on important natural features, and reduce the pressure on sensitive areas and habitats elsewhere” Unfortunately, this positivity is not carried through to Policy ECON6. We feel this is an omission.

The Dorset and Bournemouth, Christchurch & Poole Local Access Forum

- Little mention of spending power that walkers/cyclist/riders take out into the countryside, and thence the way in which well maintained access networks can help support the rural economy.

Dorset Area Ramblers

- The plan should recognise the need to support the public rights of way network as a key part of the sustainable tourism offer. Users come from far and wide and spend money on accommodation, entertainment and food.

Chideock Parish Council

- Many tourists visit Dorset because of its coastline (Southwest Coastal Path) and unspoilt countryside and country homes / estates.
- Lack of mention of the South West Coastal Path - a very popular attraction for walkers and tourists who by their very nature are eco-friendly - B&Bs / camping facilities should be promoted as exactly the sort of overnight accommodation that these people require.
- Support should be given to other environmentally friendly activities e.g., cycling / ebike stations in smaller towns etc.

Tarrant Monkton and Tarrant Launceston Parish Council

- Paragraphs 5.8.11, 5.8.13, 5.8.14 The policies concentrate on major development. Even small scale development can have a severe impact on an individual village landscape, in what has previously been village open space. This would be permanently lost, even if it may benefit an individual local business in the immediate term (but which may or may not survive in the long term). That factor should be explicitly taken into account when assessing any proposal. It is a major burden on small parishes particularly to prepare Neighbourhood plans purely to protect such open spaces.

Tetra Tech on behalf of Chedington Estate

- Countryside should not be treated as a fixed unchanging environment valued only for its appearance and character - needs to be recognised as a thriving economic environment that should be supported.

Public response

- Object - should be amended to support the intent of paragraph 5.8.10.
- Do not provide adequate restrictions on new tourist developments in rural areas.
- No obligation for tourist development to have any positive negative impact on rural communities - should be a requirement.
- Requirements of the policy should reference natural facilities, networks of public rights of way and links to the extension of the North Dorset Trailway.
- Paragraphs 5.8.13 and 5.8.18 - endorsement of the approach - examples of wider benefits to the community and the environment created by a development will be taken into account and weighed against its impacts - recognition of the planning balance is the appropriate and positive approach.

Paragraphs 5.8.15-18 - Acceptability of the scheme

Natural England

- 5.8. The section should include mention that tourism related development may directly, or indirectly, result in an increased adverse impact on Habitats sites, through increased recreational

disturbance, trampling , etc. The adopted Dorset Heathlands Planning Framework SPD applies to all residential tourism development within a 5km buffer of the heathland Habitats sites and are not permitted within a 400m buffer around a protected heathland (as set out in local plan paragraph 3.3.7.).

Public response

- Development should seek to reduce impacts on natural features and sensitive areas, tourism should favour those that are quiet and appropriate. Loss of important environmental areas could negatively impact on tourism.

Air BnB

Bradpole Parish Council

- Concern around the rise in Air B&B and suggest that enforcement should be stepped up to deal with this.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Airbnbs are burgeoning and appear to lack adequate control.

Holiday/empty/second homes

Public response

- Lack of homes due to second and holiday homes.
- Too many places have empty properties and holiday homes so no local people to care or make community investment.

8.2. Policy

Policy Numbering

Natural England

- Please note the number of the ECON6 clauses starts at VIII.

Cranborne Chase AONB Team

- The AONB notices that Policy ECON6 starts with viii or are criteria missing?

Bridport Town Council

- Numbering incorrect.

Criteria VIII & IX

Lichfields on behalf of Ralph Trustees Limited (RTL) and the Luxury Family Hotel Group

- Part VIII of the draft policy - considered to be too onerous - Hotels are required to need to continue to adapt their offer to continue to respond to changing demands of guests, and therefore flexibility is required. The benefits of a scheme should be weighed up within the planning balance against any potential harm. Suggestion of amended wording.

Historic England

- Support criteria VIII and IX in directing major tourism away development away from AONB countryside and Heritage Coast and towards town centres. Should VIII also include the World Heritage Site too if development would negatively impact on its Outstanding Universal Value?

Natural England

- Clause VIII - Recommend wording should be amended to “Major development in the countryside within an Area of Outstanding Natural Beauty or the Heritage Coast would only be permitted in exceptional circumstances”.

Dorset AONB

- Agree subject to changes. The policy is broadly supported, but could be strengthened. It is suggested that the policy be widened to state that non-major tourist development in the AONBs is unlikely to be permitted if it does not conserve and enhance the natural beauty of the AONBs.

Cranborne Chase AONB Team

- Concern with item xiv which could be argued to counter the basic point in item viii that major development in the countryside within an AONB is unlikely to be permitted.
- Quite a large number of tents can be accommodated on a site slightly less than one hectare – policy should be strengthened to provide reassurance to local communities that camping does not include late night events and concerts.

Morden Parish Council

- Tourist attractions which deflect visitors away from the busy coast should be encouraged. Managing visitor footfall to spread the impact across the area near to but not on the coast should be viewed favourably.

Charmouth Parish Council

- Criterion VIII & IX - The settlement hierarchy does not reflect the most attractive destinations for visitors, and therefore the policy should concentrate on the most sustainable locations where appropriate infrastructure exists.

Bridport Town Council

- VIII and IX - Sequential test defined in the policy directs tourism development to town centres which may not support sustainable development in West Bay.

Go South Coast

- Support with amendments, in particular, tourism development above certain thresholds should provide a transport plan that includes sustainable transport access. Propose policy ECON6(IX) be amended to include “including access by sustainable transport modes”.

Tetra Tech on behalf of Chedington Estate

- Policy wording is also more restrictive than Policy ENV4: Landscape - which does allow major development in the AONB in exceptional circumstances / where there is public benefit - need for consistency - should not preclude viable tourism opportunities from coming forward.

Public response

- It seems that the housing section of this plan is in contradiction with ECON6 where it says that major development..... is unlikely to be permitted. You have plans to specifically build on AONB in Swanage as an example.

- Supporting discouraging tourism from coast - land stability issues. Can our coastal areas handle more visitors?
- Policy wording could be strengthened in relation to AONB.

Criterion X

Historic England

- Welcome criterion X, which allows tourism development outside development boundaries where this would enable the reuse of a rural building or be part of a diversification scheme.
- Criterion X: We would like to see these criteria specifically mention heritage at risk.

Wareham St Martin Parish Council

- Policy should consider the impact of existing tourist attractions as well as new ones.

Public response

- X - Justification needs to be given in regard to the loss of current farm buildings to tourism accommodation if new replacement buildings will have to be built. It could be that some farm buildings will be required for occupational accommodation in the future.

Criterion XI

Bridport Town Council

- XI - For Bridport and West Bay, the policy should give preference to development that respects local character and contributes to a successful and sustainable visitor destination. Impact on Conservations Areas should be incorporated into the policy.

Criterion XII

Historic England

- Criterion XII “upon designated landscapes, ~~and~~ sites of biodiversity importance and heritage assets and their settings.”

Natural England

- Clause XII. The requirement for development located within protected landscapes to enhance the AONB and all development to deliver a net gain for biodiversity should be specified.

Char Valley Parish Council

- ECON6 is supported, especially sections XII and XIII. Policy needs to be more rigorously applied in the future.

Public response

- Criteria XII - Management and enhancement of all aspects of the County’s natural, historic, architectural and scenic heritage and the nature recovery programme will also be a significant source of employment. Scope for sustainable use of the county’s natural resources.

Criterion XIII

Wareham St Martin Parish Council

- XIII -Tourism development that results in harmful impacts on local services, roads and other infrastructure must not be permitted. Impact is on routes to tourist attractions, not just local to the attractions.

Public response

- XIII – support policy that require careful and firm handling of rural tourism development proposals to protect special landscape areas.

Criterion XIV

Bridport Town Council

- XIV - The policy should address climate change and reference opportunities for ‘greening’ the economy.

North Dorset Trailway Network

- XIV – This should recognise the natural facilities and the network of public rights of way and links to and extension of the North Dorset Trailway.

Public response

- XIV - Support anything that improves the diversity of visitors and residents. The towns, coastline and beaches of the Dorset coast are all year round destinations which is an important message that could be optimised more effectively.
- Respondent concerned that this part of the policy could be interpreted as being overly permissive for tented campsites which may not always be appropriate (because of their impacts on designated landscapes, including the AONB, the amenity of neighbouring uses and subsequent expansion/intensification of these types of use).

Additional criterion - Amenity

Symondsburry Parish Council

- The policy should include specific requirements that would allow the impacts of amenity to be assessed when considering planning applications to change the use of existing homes to tourist development.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Agree with approach - need to consider the impact on the amenity of neighbouring residential properties.

Additional criterion - Sustainable rural tourism

Bloombridge LLP

- OBJECT to Policy ECON6 and request that it is amended to include the positive intent of paragraph 5.8.10. Too much focus on tier 1 and 2 and town centres.

9. Policy ECON7: Loss of built tourism accommodation

9.1. Approach

Overall approach

Symondsburry Parish Council

- Support the current approach as outlined in the current wording.

- Need to recognise changing requirements for tourism accommodation. The tourism industry needs to settle after Brexit and Covid before any predicted patterns affecting accommodation are realised.

Dorchester Town Council

- Developers may deliberately allow tourist accommodation, as well as pubs and wider hospitality premises, to become derelict in order to ease permission to convert to other purposes.

Weymouth Town Council

- Reliance on tourism to provide jobs is contributing to low wage economy in Weymouth. Allowing for loss of tourism uses might be appropriate where other employment uses are delivered.

Gillingham Town Council

- We see no reason why any area of highly concentrated serviced tourist accommodation should be designated and afforded additional protection. What sort of Protection and from what?

Cranborne and Edmondsham Parish Council

- Policy does not outline the test for assessing planning applications against. It also requires applicants to prove negatives which may be impossible.
- Further clarification around how the applicant will demonstrate that an existing use is not viable/there is no market interest.

Public response

- Agree with approach.

9.2. Policy

Criterion I

Langton Matravers Parish Council

- Criteria (i) should be revised to make it clear that the occupation of dwellings, arising from a change in use of tourist accommodation, should be limited to principal residences (restricting occupation as a second home).

Criterion II

Public response

- Criteria (ii) – disagree, viability challenges may lead to dereliction.

10. Policy ECON8: Caravan and Camping

10.1. Approach

Overall Approach

British Holiday & Home Parks Association

- Policy un-necessarily restrictive.

Town and Parish Councils

- Burton Bradstock, Char Valley and Symondsburry parish councils support current approach.
- Gillingham Town Council - Yes, but we would like to see facilities for overnight camper vans/motorhomes throughout the county.
- Char Valley Parish Council - Needs to be more rigorously applied in the future.

Public response

- Aspects of the emerging policy and supporting paragraphs that are not positively prepared, are inconsistent with one another and inconsistent with national policy or guidance.
- Respondent concerned that the policy could be interpreted as being overly permissive for tented campsites/caravan site which may not always be appropriate (because of their impacts on designated landscapes , including the AONB, the amenity of neighbouring uses and subsequent expansion/intensification of these types of use).

Definition of Caravan and Camping sites

Public response

- Agreement with definition of a caravan and camping site - recognising the need for holiday parks to evolve to meet guest demand to provide for a variety in the tourist accommodation offer.
- Include reference to shepherd huts.

Paragraph 5.10.2 - Area of outstanding natural beauty & Heritage coast

Cranborne Chase AONB Team

- Major development in the countryside within an AONB is unlikely to be permitted.
- Quite a large number of tents can be accommodated on a site slightly less than one hectare – policy should be strengthened to provide reassurance to local communities that camping does not include late night events and concerts.
- Policy could be strengthened to provide reassurance to local communities that camping does not include late night events and concerts.
- Strongly advise that other land in the control of an applicant that was granted permission for tourist development within the AONB should have Permitted Development Rights removed, or an Article 4 Direction placed on it to avoid activities that haven't been explicitly approved.

Charmouth Parish Council

- Paragraph 5.10.2 - welcome the policy stating that new sites and extensions are unlikely to be permitted in AONBs.

Public response

- Disagree with no caravan/camping sites in the AONB – should allow for small scale motorhomes in the AONB.
- Support for protection of landscapes should be extended to include valued landscapes and land close to designated land where development could have detrimental visual effect.
- Permit new caravan and campervan sites within AONB, particularly along A35 corridor, with maximum 20 units and no opening date restrictions - greater demand following COVID.
- Constraints should apply to sites that are visible when travelling near the heritage coast, particularly static caravans and prefabricated homes, less so on season activities.

- Unless the Council has the resources, and willingness, to enforce this proposed policy the commercialisation of the AONB will continue at the expense of the landscape - e.g. Durdle Door Holiday Park.

Paragraph 5.10.3 - Diversification

Chideock Parish Council

- Farms should be allowed to diversify as it will improve their cash flow for the agricultural need of their farms.

Litton Cheney PC

- Litton Cheney PC supports the approach but feels that farm diversification projects should be required to demonstrate how they contribute to the viability of the diversifying farm business.

Paragraph 5.10.4 - Landscape

Portland Town Council

- Issues around landscape protection, location and aggregation are of main concern and whether the policy would encourage zonal allocations.

Public response

- Scale is critical to impact on landscape character of the area.
- Policy protection for AONBs in relation to new sites and extensions is broadly welcomed.
- Concern about lack of trees/screening planted to soften sea of vans.
- Small tent sites might encourage a greener non-invasive tourism.

Paragraph 5.10.7 - Static Caravans

Litton Cheney Parish Council

- Would wish to see appropriate safeguards to stop the potential drift from touring to static caravan sites.

Public response

- To some extent policy encouraging caravan and camping sites to become static home parks. These are all prone to becoming de facto housing estates that are lived in all year round and can often be advertised for sale as holiday homes. This is not acceptable.

Paragraph 5.10.9 - Dorset Heathlands

Natural England

- Paragraph 5.10.9. Any new caravan and camping facilities within the AONBs should also be required to meet AONB Management Plan objectives by enhancing the AONBs. Natural England welcomes the mention of the 400m restriction around the heathland Habitats sites.

East Dorset Environment Partnership

- Paragraph 5.10.9 Amend wording of final sentence so that it agrees with heathlands Policy ie “No sites will be permitted on sites with biodiversity interest or within 400m of the Dorset Heathlands.”.

Occupancy

Morden Parish Council

- To prevent 'caravan sites becoming permanent features. All permissions should be time limited - for example 5 years when the site should be reconfigured to suit newer criteria.

Public response

- Introduce a requirement for the occupation of caravans to be limited to holiday accommodation only at those sites where market housing would not normally be permitted.
- Unless there is a policy to regularly check on the occupation of caravan sites, no new sites should be permitted.
- Existing Caravan sites should not be supported to extend their season. Encourage use of current built visitor accommodation during out of peak season times instead.
- The support for proposals that enable existing sites to extend their visitor season therefore may be the cause of a loss of tourist accommodation. The call for tourist accommodation outside the Spring/Summer/Autumn season is low and could be met by hotels, b & b's or holiday let cottages.
- Caravan sites should be required to apply for planning permission to upgrade to lodges. Current policy encouraging residential occupation of these sites by the back door, in locations where open market housing would not normally be permitted.
- There are many temporary camping sites during the summer which operate beyond the legal limit effecting registered long term providers.

Coastal erosion

Jurassic Coast Trust

- Clarity about the expectations of how caravan sites should adapt to coastal change is crucial. Currently reads as an assumption that caravans are mobile and therefore readily adaptable to coastal retreat. However, in reality, caravan units are often privately owned making moving them very difficult for site owners. Link needed to section and policy about coastal change and CCMA's.

Natural England

- We recommend consideration is also given to ensuring that any new caravan or camping site that is permitted in a coastal location that is subject to coastal erosion is required to provide a short and long term coastal adaptation plan for how that site will alter spatially in response to coastal change.

Bloombridge LLP

- Consideration needs to be given as to how many tourists can be accommodated in an area where safety has been highlighted by cliff falls and safe beach size reduced.

Green Belt

Public response

- Prepared to remove Green Belt but not allow potentially unobtrusive camping or caravan sites within it.

Transport and access

Gillingham Town Council

- Provision of a transport assessment should be provided for sites larger than 0.1 ha as should amenities such as water, electric, toilets, showers, washing up facilities and for disposal of all waste.
- It must be pointed out that the extra larger vehicles traveling to and from a caravan site must be considered along with the impact to the local highways and surroundings.

Loders Parish Council

- Need to consider the accessibility of new caravan and camping sites. They're often accessed by narrow country roads.

Public response

- Camping and caravan sites need to consider impact on roads, access to shops, etc.
- New caravan/camping sites to be located within reasonable walking distance of public transport routes.
- Seems to be reduction in mobile sites leaving car parks open to abuse.
- Concerns over mobile homes moving to new locations every day and pollution as a result.

Infrastructure and facilities

Grove Medical Centre

- Need to consider the impact of visitors using health facilities and the knock on effect on services for local residents.

Bridport Town Council

- A mix of facilities is needed, in order to cater for different types of tourism.
- The policy should ensure that significant developments contribute (financially if necessary) to the sustainability of the local economy and local facilities.

Amenity

Cranborne Chase AONB

- Guidance exists from AONB regarding building design and lighting in the AONB/International Dark Sky Reserve that should inform the plan.

Wareham St Martin PC

- Should consider the impact of caravan and camping sites on local resident quiet enjoyment of homes.

Sewage and water quality

Wessex Water

- Residential and other regularly occupied/sensitive development should not be permitted in locations likely to be adversely affected by the operation of sewage treatment, sewage pumping and other water treatment or supply infrastructure. This is to ensure development proposals are unaffected from odour emissions, noise, vibration, flies or other nuisance.

- Caravan and Camping sites are likely to be rurally located and as such may be in locations not served by mains drainage. The policy approach should ensure that adequate arrangements are made for drainage to protect water quality.

10.2. Policy

Reorder criteria

Tarrant Monkton and Tarrant Launceston Parish Council

- Re-order bullet points, replacing I - III by IV - VI to emphasise that proposed developments have to fit within parameters of protecting heritage, landscape, etc.

Criterion I

Tetra Tech on behalf of Chedington Estate

- Support criterion I but it should also apply to farms in the AONB (criterion V) as they have equal need and ability to diversify.

Public response

- Criterion I - support proposals for on-site facilities within existing sites.

Criterion II

Historic England

- Criterion II: include reference to heritage at risk.

Cranborne Chase AONB

- Criterion II - AONB's Guidance on Farm Diversification indicates that caravan and camping sites would not necessarily be supported and, therefore the AONB, would wish to see the 'will' be changed to 'may' in that paragraph of the policy.

British Holiday & Home Parks Association

- Criterion II should be removed, farm diversification shouldn't be linked to improving viability of existing business.

Charborough Estate

- Criterion II is supported but policy should be amended so that the beneficiary of the diversification is not necessarily a business or enterprise in the same location as the diversification project, but linked to it in some other tangible way.

Criterion III

British Holiday & Home Parks Association

- Criterion III - there is no national policy support for management plans being required for expansion of businesses to improve appearance - prevents high quality, well-designed caravan parks from expanding.

Public response

- Criterion III - support for demonstration that development forms part of a long-term management plan.

- Criterion III - Control needed over numbers of vans on a site, taking into account increasing sizes of vans, increase in hard landscaping and numbers of cars parked per van.

Criterion IV

Historic England

- Welcome criteria IV.

East Dorset Environment Partnership

- Supports the policy and supporting paragraphs, particularly the intention to safeguard biodiversity, landscape and rural character.

Public response

- Criterion IV - not positively worded and should be amended to achieve a balance between benefits and significant harm that cannot be mitigated.

Criterion V

Natural England

- Criterion V - The protection afforded to AONBs should be strengthened in line with local plan policy ENV4 and objectives of the AONB Management Plans. We suggest this is achieved through the following amendment: “will only be permitted where they ~~do not harm~~ serve to conserve and enhance the special character of the area.”.

Historic England

- Criterion V: consider if this should also include the World Heritage Site.

Dorset AONB

- Criterion V - the requirement to ‘not harm’ the AONBs should be amended to require such applications to ‘conserve and enhance’ the AONBs, making this policy more consistent with the legal purpose of AONB designation and wording used elsewhere in the plan.

British Holiday & Home Parks Association

- Criterion V - contrary to national policy which allows for changes of use in areas provided they do not harm the purpose etc and character of the green belt. Also against national policy to not support proposals within the heritage coast and green belt - should allow for small scale development consistent with the special character. Proposed amendments to policy provided.

East Dorset Environment Partnership

- Lack of mention in the policy of relevant heathland mitigation requirement for sites within 400m-5km of designated sites – should be added as a requirement in the Policy.

Langton Matravers Parish Council

- Criterion V of the policy should make reference to SSSI.

Public response

- Criterion V - agree with approach and sequential approach to finding an acceptable approach.
- Criterion V - requirement to ‘not harm’ the AONBs should be amended to require such applications to ‘conserve and enhance’ the AONBs.
- Needs to be clear about the differences between individual and cumulative impacts.

Additional criteria

Cranborne and Edmondsham Parish Council

- Add “Where a site is permitted in a location where open market housing would normally be refused, the councils will restrict its occupancy to ensure it remains in use as tourist accommodation” to Policy text.

Wessex Water

- An additional criterion should be added to ensure that sites are located outside of odour buffer zones of Sewage Treatment Works and Sewage Pumping Stations.

Natural England

- We recommend consideration is also given to ensuring that any new caravan or camping site that is permitted in a coastal location that is subject to coastal erosion is required to provide a short and long term coastal adaptation plan for how that site will alter spatially in response to coastal change.

11. Policy ECON9: New agricultural buildings

11.1. Approach

Overall approach

Symondsburry Parish Council

- Support the current approach as outlined in the current wording.

The Charborough Estate

- Policy ECON9, which allows new agricultural buildings and extensions to existing buildings. Is supported.

Green Martinstown Nature group

- Changes due to intensification will continue in the next 17 years and will require planning to be flexible to control destruction of the environment by farming but support rural jobs.

Public response

- Agreement with the approach.
- Support for new agricultural buildings that diversify work/production.
- Transition farms to more ethical and sustainable business.
- The sector operates on small margins and diversification is key. Much of the landscape has been shaped by agriculture and is not natural, the impact of growth is negligible. This policy is unnecessarily restrictive, the local plan should be more open to agricultural building development.

Paragraph 5.11.1 - Permitted development

Cranborne and Edmondsham Parish Council

- Is it the intention to place significant restriction on current permitted development rules? Clarify the extent to which the current rules on permitted development are to be changed.

Holwell, Milborne St Andrews and Motcombe Parish Councils

- Wording more similar to that used in Part 6 Class A ref A.1.a and b of the GDPO may be appropriate to avoid loophole where existing agricultural buildings can be converted or sold off immediately prior to the application.

Gillingham Town Council

- Would like a policy that prevents new agricultural buildings from being converted to residential.

Public response

- Clarify whether the plan changes permitted development rights.
- Concern - creating precedent for change of use. Impact can be minimised by tree planting.
- new agricultural buildings are acceptable, but their existence should not be seen as encouragement for future further residential developments.

Paragraph 5.11.3 - Green Belt

Public response

- Paragraph 5.11.3 - new farm buildings in the Green Belt will be considered inappropriate and not allowed. With all the other incursions and developments of the Green Belt allowed I feel this should be allowed. Where else will farm buildings be put?

Paragraph 5.11.4 - Larger agricultural buildings

Cranborne and Edmondsham Parish Council

- The distinction between the treatment of large agricultural buildings and new agricultural buildings and extensions to existing agricultural buildings in paragraphs 5.11.1 0 5.11.4 is unclear and conflicting.
- Define “large” agricultural buildings and when an extension to an existing agricultural building makes it a large agricultural building.

Landscape & Area of outstanding natural beauty

Cranborne Chase AONB

- Guidance exists from AONB regarding building design and lighting in the AONB/International Dark Sky Reserve that should inform the plan.

Symondsburry Parish Council

- Within the Western Functional Area, the majority of land is an AONB. It must be recognised that great care must be taken in considering the effect of any new agricultural buildings on the landscape and view corridors so that they can blend.

The Charborough Estate

- The policy wording and supporting text could be clarified to explain that the location of the new building needs to be assessed with a balance of both the functional needs and the objective of minimising harm to landscape character. The policy should also recognise that the impact in the landscape can be reduced through careful design and use of materials.

Biodiversity

Erica Trust

- There does not appear to be anything to prevent the construction of new agricultural buildings in sites of high biodiversity interest – recommend there should be some cross reference to other relevant policies.

11.2. Policy

Criterion II

Historic England

- Amend criterion II: ‘The scale, siting, design and external appearance of any new agricultural building (or extension) should be designed to minimise adverse impact on the landscape character, heritage assets and their settings and residential amenity.’.

Langton Matravers Parish Council

- Clause II. should be revised to include: ‘Permission will not be granted if pre-existing agricultural buildings on the site have previously been converted for housing, tourism or employment purposes’.

Additional criteria

Dorset AONB

- Policy should also include ‘redevelopment’ of existing farm buildings. This could help to encourage farms to first reuse previously developed land (including redundant buildings) before expanding into undeveloped countryside.

Public response

- Recommend policy refers not only to the ‘re-use’ of existing farm buildings, but also to ‘redevelopment’ of these. This could help to encourage farms to first reuse previously developed land (including redundant buildings) before expanding into undeveloped countryside.

12. Policy ECON10: Diversification of land-based rural businesses

12.1. Approach

Overall approach

Symondsburys Parish Council & Alderholt Parish Council

- Support the policy approach.

Litton Cheney PC

- Concerned that farm diversification may lead to future pressure for development at inappropriate locations.

Gillingham Town Council

- Gillingham Town Council would like to see a policy which would not allow recently built or extended agricultural buildings to be converted to residential homes.

Bridport Town Council

- The policy should guard against the dilution of agricultural production, and against inappropriate alternative uses of agricultural land.
- The policy should be adapted to support the development of community farms and other sustainable local food initiatives.

Tarrant Gunville Parish Council

- Concerned that there is no mention of any economic assistance for employment in rural areas.

Cranborne and Edmondsham Parish Council

- ECON10 is not sufficiently ambitious in its scope and risks limiting severely the extent of diversification of land-based rural businesses.

National Trust

- Broadly support but consider it also important to acknowledge the transition taking place from traditional agriculture to new models for the rural economy based on payments for wider public benefits.

Tetra Tech on behalf of Chedington Estate

- Agree with suggested approach and wording. Support the broad interpretation of rural business and the range of development / uses which are allowed within the policy but this support needs to be reinforced through the plan and all relevant policies.

The Charborough Estate

- Supports farm diversification projects, especially the recognition that new buildings may be required to meet the needs of a diversification scheme.

Bloombridge on behalf of Shaftesbury Estate

- Estate strongly supports and welcomes this policy.

Dorset Climate Action Network

- Support the principle of diversification in the farming economy - adding value to farm products and growth of farm based tourism.

Ramblers

- We suggest that this section should acknowledge and reflect that it may need amendment to cover the changes in agricultural support mechanisms arising from Brexit. The new Environmental Land Management (ELM) scheme is founded on the principle of "public money for public goods" and will mean that farmers and land managers may be paid for providing, for example, opportunities for improvements in biodiversity, clean water and opportunities to engage with the environment. As yet these schemes are still in trial stages.

Neighbourhood Plan Group

- Define "Rural Business".

Public response

- Support as it will make villages more sustainable.
- Transition farms to more ethical and sustainable business.
- Respondent concerned that the policy could be interpreted as being overly permissive for tented campsites which may not always be appropriate (because of their impacts on designated landscapes, including the AONB, the amenity of neighbouring uses and subsequent expansion/intensification of these types of use).

Paragraph 5.11.5 - Environmentally sustainable business models and non-farming enterprises

Natural England

- Paragraph 5.11.5 - welcomes the support for farm diversification, but considers the requirement for the diversification to be limited to the existing business as unnecessarily restrictive (see other comments). As new funding streams and environmentally sustainable business models evolve, diversification is likely to lead to the development of non-farming enterprises on former agricultural land - through rewilding schemes, nutrient offsetting, biodiversity net gain delivery, carbon sequestration, etc. Existing business use would no longer be a relevant consideration, rather the new proposal should be required to meet other local plan policies.
- Existing enterprise should no longer be a relevant consideration, where the new proposal meets other local plan policies that deliver multi-functional environmental benefits (see Environmentally sustainable business models and non-farming enterprises section).
- As written the policy and supporting text would disallow altering land management away from intensive agriculture towards the delivery of ecosystem services, e.g. re-wilding or nutrient offsetting.
- Look again at the farm diversification policies and supporting text either to adjust them so that they more readily encompass the changes in enterprise mix likely to accompany these more significant land use changes, or introduce a new policy specifically dealing with the issue.

Paragraph 5.11.6 - Types of appropriate use for diversification

Town and Parish Councils

- Need definition and examples of what business types appropriate for diversification.

The Charborough Estate

- The supporting text should explain or give examples of appropriate uses for diversification projects. In some cases, appropriate diversification may include converting accommodation into rentable dwellings, to raise an income for the farm business, and also positively contribute to the national objective of boosting housing supply.

Paragraph 5.11.7 - land-based diversification

Natural England

- Paragraph 5.11.7 - recommend the paragraph is amended to provide greater flexibility for the purposes of farm diversification: “It could also include taking land out of agricultural production, or moved to low intervention management to deliver multifunctional environmental benefits such as biodiversity enhancements including delivering net gain and nutrient offsetting for development elsewhere and carbon sequestration.”

National Trust

- Farms and land-based businesses will need to be enabled to diversify in order to develop new income streams. The local plan needs to help and support this, particularly where wider benefits for people and nature can be demonstrated.

Dorset Local Nature Partnership

- Policy ECON10 - Either amend to enable changes towards opportunities for rewilding or add a new policy (see 5.11).

Dorset Climate Action Network

- Potential for the county's woodlands to produce timber for the purpose of buildings, furniture and other products – potential benefits include secondary incomes, local employment, and reduction in use of materials that have heavy loads of embedded energy.

Woodland Trust

- New Environmental Land Management towards 'public money for public goods' may prompt shifts in both demographics of land workers and the nature of land-based livelihoods (from conventional agriculture to stewarding carbon, biodiversity and other ecosystem services), which needs to be enabled by the Local Plan.

Public response

- Transition farms to more ethical and sustainable business.

Paragraph 5.11.8 - Green Belt

Public response

- New farm buildings should be allowed in the green belt.

Paragraph 5.11.9 - Existing buildings

Public response

- Paragraph 5.11.9 suggests additional text around changes to existing buildings.

Paragraph 5.11.12 - New built development

Natural England

- Paragraph 5.11.12 - recommend that the requirement for the new build "to be ancillary to the existing enterprise" is deleted as it is likely to be unnecessarily restrictive when a farm diversification scheme may take agricultural land, and potentially a whole farm, permanently out of production (for example for nutrient offsetting or carbon sequestration purposes).

Dorset Wildlife Trust

- Sometimes buildings in agricultural settings are not of similar merit.

Paragraph 5.11.13

Public response

- Paragraph 5.11.13 seems unnecessarily restrictive vs. taking away Green Belt.

Paragraph 5.11.14 - supporting an existing enterprise

Natural England

- Paragraph 5.11.14 - provided the diversification proposal(s) meet other local plan policies, Natural England considers the requirement for the diversification to be limited to the existing business as unnecessarily restrictive.

Dorset Local Nature Partnership

- Recommend that consideration is given to the farm diversification policies to address changes in enterprise mix likely to accompany radical land use changes.

Cranborne Chase AONB Team

- The policy does not appear tie diversification projects to the existing farm business, nor to the land.
- The policy, as currently worded, would enable businesses to be split off from the farm and therefore the basic concept of diversifying to sustain the farming activities would be lost.
- Strongly advises that this policy should be carefully reviewed to avoid potential unintended consequences of significant independent businesses becoming established under a policy that appears to be intended to support existing farm businesses.

Cranborne and Edmondsham Parish Council

- Land-based rural businesses should be permitted to rent properties to separate enterprises to encourage rural employment and reduce traffic movements by providing places of employment closer to rural dwellings. See Cranborne as an example of successful diversification of previously redundant farm buildings incorporating a brewery, cheese manufacturer, parfumer, charcuterie and air-conditioning supplier inter alia.

Bloombridge on behalf of Shaftesbury Estate

- Question the practicality of paragraph 5.11.14 - very likely that diversification will involve a separate business, separate management, and separate funding as part of the process of managing the risk of failure (and success).

The Charborough Estate

- Some flexibility is required so that the beneficiary of the diversification scheme is not necessarily a business or enterprise in the same location as the diversification project but linked to it in some other tangible way.

Local environmental groups (non-statutory)

- Paragraphs 5.11.12 and 5.11.14 could be re-worded to better reflect the breadth of diversification opportunities that these nature-based opportunities present.
- Paragraphs 5.11.12 and 5.11.14 – paragraphs would tend to disallow an enterprise mix where farmers / landowners are altering their land management away from industrial agriculture and towards the delivery of ecosystem services.

Public response

- Makes no sense for a diversification project to be tied to the business that is diversifying, preventing it becoming a separate enterprise.
- Supported in principle but should not insist on retaining link to original business/activity.
- Reference should be made toexisting 'profitable' enterprise....

- Scope of support for diversification should be widened and encourage sub-letting to support diversification.

Climate Change

Bridport Town Council

- The policy does not reference the climate emergency and should be adapted to recognise the importance of agriculture to addressing climate change.

Dorset Climate Action Network

- Welcome diversification trend in farming as an opportunity to tackle climate change.

Woodland Trust

- We highlight the emerging policy in Cornwall (Climate Change DPD Policy AG1) which requires Whole Estate/Farm Plans for rural developments, to assure that development proposals respond positively to the climate emergency and deliver multiple environment, social and economic benefits.

Public response

- Environmental change requires a flexible approach to rural employment, ensuring that there are new jobs for local people that contribute to the management of the climate emergency but avoiding activities that overload rural roads.
- Policy fails to address the growing sector of renewable energy. Local solar and wind farms are a form of rural diversification and the policy should include a clear reference to development.

Poole Harbour

National Trust

- Diversification in the catchment of Poole Harbour should ensure that it avoids harm arising from increased nutrient levels and eutrophication.

Landscape and Area of Outstanding Natural Beauty

Cranborne Chase AONB Team

- Farm diversification projects should, within this AONB, relate to this AONB's Guidance on Farm Diversification – should inform this part of the plan.

Local infrastructure

Symondsborne Parish Council

- Upgrading local infrastructure may need to be considered.

Neighbourhood Plan Group

- The local infrastructure may require upgrading depending on the nature of any diversification.

Public response

- Effects of diversification on/investment in local infrastructure needs to be considered.
- Increased home-working, an effect of Covid-19, will lead to rapid introduction of Fibre to the Premises broadband by 2025 or 2030 making diversification of land-based rural businesses all the more feasible.
- Diversification needs to be taking account of existing infrastructure.

Traffic and access

Cranborne Chase AONB Team

- Concern that the policy would allow the sort of storage and distribution business that impacts the AONB with increased travel and fleets of vans causing disruption to local traffic flows and tranquilly.

Sewage and water quality

Wessex Water

- Land-based rural businesses may be in locations not served by mains drainage. The policy approach should ensure that adequate arrangements are made for drainage to protect water quality.

Amenity

Public response

- Diversification needs to be taking account of the impact on the amenity of existing residents.

12.2. Policy

Policy number error

Natural England/ AONB Team/ Local Groups/ Town and Parish Councils/ Public responses

- Inconsistent numbering and the final paragraph appears to be truncated and missing some text.

Criterion III

Historic England

- Support diversification. ECON10 III and text should refer to heritage at risk and should consider impacts on heritage assets and their settings.

Loders Parish Council

- We recommend adding “and not at the expense of the environment” as an additional bullet point to criterion III.

Cranborne and Edmondsham Parish Council

- Delete “(for agricultural and other land-based rural businesses)...” from ECON10 (III).

Public response

- Delete '(for agricultural and other land-based rural businesses)'.

Criterion IV

Cranborne and Edmondsham Parish Council

- Paragraph IV of ECON10 has been truncated and is incomplete.

13. Policy ECON11: Equestrian Development

13.1. Approach

Overall approach

Cranborne Chase AONB Team

- The policy hasn't come to grips with the issue of larger establishments and the simple introduction indicating that they will be permitted is a little too relaxed.

Symondsburry Parish Council

- Support the current approach as outlined in the current wording.

Tetra Tech Planning on behalf of the Chedington Estate

- We support there being a specific policy for the development and expansion of commercial and private equestrian facilities.

Paragraph 5.12.9 - Commercial recreation and leisure equine-related development

Charborough Estate

- Welcomes the Council's support for commercial ventures for equine-related developments and recognises that such schemes can help to diversify individual farms and the wider rural economy.

Paragraph 5.12.10

Bloombridge

- We support the guidance on commercial equine development set out at paragraph 5.12.10 of the draft Plan but, consistent with these representations generally, we suggest that the needs case is balanced by reference to the role of rural enterprise and innovation.

Gillingham Town Council

- New building may be permitted where there are no existing buildings for re-use.

Paragraph 5.12.12

Natural England

- Paragraph 5.10.12 Commercial equestrian developments can have significant impacts on landscape character that go beyond consideration of the buildings, most notably the provision of gallops and associated fencing - suggest this issue is addressed by amending the last sentence to read: "Elements of new buildings and associated facilities such as gallops that are disproportionate in scale to or out of character with the existing buildings or have a significant impact on the landscape especially within the AONBs, are unlikely to be acceptable".

Paragraph 5.12.13

Charborough Estate

- Paragraph 5.12.13 needs to clarify how the Council will assess whether a proposed commercial equine-related enterprise has a sound financial basis.

Paragraph 5.12.14

Thornhackett Parish Council

- Paragraph 5.12.14 – clarification required regarding the HOUS policy referenced - HOUS8 sub-sections VIII to X would seem to cover the removal of occupancy conditions.

Dorset Heathland

Natural England

- Should include mention that equestrian-related development may directly, or indirectly, result in an increased adverse impact on Habitats sites.
- Indirect impacts on Habitats sites may occur where an increase in stables would lead to more horses exercising on the protected sites, causing increased disturbance and erosion issues - particular concern where such sites are included in the bridleway network.
- The adopted Dorset Heathlands Planning Framework SPD applies to all equestrian development within a 5km buffer of heathland Habitats sites and are not permitted within a 400m buffer around a protected heathland.

Landscape

Portland Town Council

- Issues around landscape protection location and aggregation are of main concern and whether the policy would encourage zonal allocations.

Public response

- Need tighter control on siting and suitability to blend into the countryside for horse shelters and other equine accoutrements - little enforcement is common.

Employment

Sport England

- Equestrian sport in all its disciplines plays an important role in the local, national and international settings. For generations this country has produced world class athletes, in all categories, disabled, men and women. It is important to continue to support new and improved equestrian centres. It should also not be overlooked the economic value of equestrian centres play in the local economy.

Vale of Allen Parish Council

- Every rural enterprise should provide a viable business plan - not just equestrian businesses.

Public response

- Include what is a minimum number for horses for a profitable equine business.

Water and Sewage

Wessex Water

- Equestrian businesses may be in locations not served by mains drainage. The policy approach should ensure that adequate arrangements are made for drainage to protect water quality.

13.2. Policy

Formatting error

Thornhackett Parish Council

- The box at the top of page 216 seems as if it should be part of the policy has become detached.

Criterion I

Ramblers

- We welcome the recognition that equestrian developments should only take place "without causing harm to rights of way" in criterion I. Bridleways must be able to sustain any extra use which would result from a equestrian development (the passage of horses can poach the surface of paths making them difficult for walkers and cyclists).

Criterion II

Vale of Allen Parish Council

- Permission should only be given where there are no/minimal effects on the road network.

Criterion III

Historic England

- ECON11 III should consider impacts on the historic environment.

Cranborne Chase AONB Team

- Concerns about external lighting at stables and, artificial surface facilities - item iii of the policy simply requires the issues 'have been considered' rather than anything being done about them.

Public response

- Add to (iii) "..and are not considered harmful".

Criterion IV

Public response

- Policy Econ11 IV second bullet should readbuilt of materials that complement the landscape and that are capable of In this way the materials used in a rural environment can be controlled.

Criterion V

Cranborne Chase AONB Team

- In the third bullet point of paragraph v the objective should be to integrate with the local landscape character rather than simply minimising impacts upon it.

Gillingham Town Council

- At V. insert `if any` after `(or group of buildings)`.
- Delete `an element of`, insert `if any` after `(or group of buildings)`.
- Delete `element of` and insert `if any` after `(over....group of buildings)` in the second bullet point.

- Insert `if any` after `(or group of buildings)` in the third bullet point.
- These amendments will allow new buildings where there were none.

Criterion VI

Public response

- Concerned at the inclusion of a test for unviability in policy, this invites a prejudgment on the re-utilisation of equestrian buildings. Policy provides a green light for developers or landowners to claim an equestrian site they own is inappropriate or unviable and seek to redevelop it to detriment potentially of small hamlets. (See also policy DEV8).

Additional criterion – Conversion to residential

Gillingham Town Council

- Gillingham Town Council would like to see a policy which would not allow recently built or extended equestrian buildings to be converted to residential homes.

Additional criterion - Area of outstanding natural beauty

Natural England

- Clauses I, III, V and VI - should include specific reference to AONBs - Alternatively an additional Clause should be added to ECON11 requiring all equine-related development within AONBs to serve to conserve and enhance the special qualities of the protected landscape.

Dorset AONB

- Given the increasing scale of a number of equine businesses across Dorset AONB, it is considered that the Policy could be expanded to respond to the transformative effects that such facilities can have on the character and appearance of the countryside, in general, and the AONBs, in particular.
- It should perhaps be highlighted that large-scale equine facilities will be assessed in relation to the full extent of their impacts, which may include effects from both buildings and associated training facilities. The creation of large-scale facilities that transform the traditional agricultural character of the AONBs should not normally be permitted.
- In some cases, such applications will be considered as forms of 'major development', due not only to the amount of built development proposed, but also the wider effects of the development, including training facilities, on the special qualities of the AONBs.

Additional criterion – Dorset Heathlands

Natural England

- A further clause should be added setting out the restriction on equestrian development within 5km and 400m of the heathland Habitats sites.