



Dorset Council **Local Plan**



Environment and Climate Change

2021 Consultation
Summary of Responses



January 2023



Dorset
Council

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1. Introduction

General comments regarding the Environment section

RSPB

- Concern with some of the language used, such as referring to ‘environmental constraints’ especially when elsewhere in the plan they are clearly identified as major assets in the plan area – suggestion to replace ‘constraints’ with ‘considerations’.

Cranborne Chase AONB Team

- Concern with the term ‘respects’ in the section - can mean very little in practice other than some hand wringing and apologies for landscape and environmental damage.
- Very concerned that the focus is limited to biodiversity and not the wider aspects of landscapes.

Dorset Climate Action Network

- Welcome the broad thrust of this Section.

Inspired villages

- Emphasis should be included within the Environmental policies of the Plan with regard to the reuse of previously developed sites, ahead of greenfield development.

Town and Parish Councils

- The total loss of agricultural land has not been quantified.

Public response

- Dorset's environment is its greatest asset - promoting wellbeing in residents and visitors. Concern that planned growth will have adverse effects on the environment.
- The Local Plan does not adequately consider the impact of the proposed growth on the environment, natural capital, ecology and heritage assets.
- Protection of environment should be at the heart of the plan - hedgerows and wildlife are vital.
- Plan does not consider how as a community and a country we are going to move forward in harmony with nature.
- Make environmentally friendly policy a priority.
- Aiming for a high quality environment should hold a higher priority over managing growth.
- Needs greater emphasis on the environment - supporting and encouraging local farmers, rewilding, DWT, protecting the sea, fishing (sea and freshwater).
- With reference to the built environment, the plan seems to have been largely recycled.
- Development will result in the loss of agricultural land.
- Development on farmland will lead to food insecurity.
- Farmland must be kept as farmland as the Country needs to feed itself and get away from the current 50% imported food.

Paragraph 3.1.1

Town and Parish Councils

- The Local Plan should recognise the fragility of the Dorset countryside - particularly along riverbanks where roads, paths and bridges are prone to flooding and collapse.
- Need to pay attention to wider implications of development both upstream and downstream.

Natural England

- Revise paragraph 3.1.1 to add ‘nationally’ important habitats.

Environmental groups (non-statutory)

- Amend to ‘there are many international, national and locally ~~important~~ designated and important habitat and ~~protected~~ species’.

Public response

- Would like to see this part of the plan go further in its recognition of the importance of the natural biosphere, the need to value it and to progress its repair from harms it has suffered.
- Insufficient recognition of or respect for Dorset’s exceptional environment, wildlife and heritage, including but not only the many protected areas and designations, Green Belt, AONBs etc. The environment and heritage is Dorset’s greatest economic asset and our future health and wealth depend on them.

Paragraph 3.1.2

Loders Parish Council

- Agreement with the recognition of the importance of Dorset’s outstanding environment and the steps proposed which seek to enhance it and move towards a more sustainable future.

RSPB

- There is ambiguity regarding the level of commitment expressed in the plan to enhance Dorset’s environment, in para 3.1.2 states that DC ‘seeks to’ enhance the natural environment, while in fig 3.1 it states that DC ‘will’ protect and enhance the environment.
- The plan must be clear on the level of commitment of the Council.

Amphibian and Reptile Conservation

- Amend to ‘environment and ~~seeks enhancement with a~~ **will** move towards a more sustainable future’.

East Dorset Environmental Partnership

- Amend to read “...with a move towards a **far** more sustainable future.”

Dorset Local Nature Partnership

- Support.

Figure 3.1 Strategic policies within the Environment and Climate Change section

Natural England

- Figure 3.1 rather highlights the plan’s lack of ambition, or urgency, in tackling the climate change and ecological emergency recognised by the Council.

Historic England

- The ‘unique environment’ priority should be updated to refer to conserving and enhancing the historic environment.

Amphibian and Reptile Conservation

- Final section to refer to Section 41 species and habitats and species of local importance. There should be a link the Dorset LNP climate change papers.

East Dorset Environmental Partnership

- Amend to comply with comments made on Strategic Priorities.

Public response

- No mention in the strategic policies table to AONB.
- Welcome the statements of preserving natural capital and biodiversity, and that all new developments incorporate ecological net gain but many of the statements in this section seem vague with few ideas that will affect the activities or behaviour of its citizens.
- All developments go against every one of the Relevant Strategic Policies in 3.1.

Effectiveness of policies

Town and Parish Councils

- Burton Bradstock Parish Council – Policies to protect the environment need to be backed up by effective enforcement measures.
- Char Valley Parish Council - This section is weak and mostly aspirational rather than practical, with policies that are confusing and overlap. There is a lack of positive policies, such as opportunities for green jobs. The Vearse Farm approval at Bridport demonstrates the ineffectiveness of all the environmental policies in the Plan.
- Loders Parish Council - Policies must address the harmful impact on bio-diversity and the local risk of flooding through smaller scale incremental development.
- Concern that environmental policies are weak and non-enforceable – open to interpretation by officers and developers.

South West Coastal Path Association

- Policies are broadly supported to the extent that they meet the Associations aims for the quality of the Coast Path and its corridor.

Public response

- Concerns with the lack of flexibility provided with the detailed wording of proposed policies in relation to the environment.
- Plan lacks commitment to specific policies and actions.
- Would like to see the provision in remodelled planning rules to prevent any development in river valleys, on flood plains and food producing land including allotments.
- No commitment to use section 106 agreements for the benefit of the environment.

Evidence

East Dorset Environmental Partnership

- Plan should include information from the Report on the workshop in 2019, Dorset LNP position papers, the LNP conference 2021 and the findings of the recent Dorset Council consultation.

Public response

- Consider the Dasgupta Review.

1.1. Marine Planning

Marine Management Organisation

- We recommend the South Inshore and East Offshore Marine Plan is mentioned within the Environment section, showing you have regard to the South Marine Plan.
- Marine plans inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included.
- The South Inshore and Offshore Marine Plan is of relevance and an interpretation of the plan should be completed. Suggested policies of relevance include: Co-existence, Ports and Shipping, Infrastructure, Cables, Renewables, Fishing, Tourism and Recreation, Employment, Social, Access, Climate Change, Heritage, Seascape, Marine Protected Areas, Marine Litter, Underwater Noise, Water Quality, Biodiversity, Displacement, Dredging and Disposal.

1.2. National Park in Dorset

Dorset National Park Team

- Dorset is widely seen as the outstanding candidate for designation as a national park, which would bring additional resources and expertise and would complement and contribute to the Council's work and strategic objectives. We look forward to the Government confirming Dorset's outstanding candidacy for National Park status and to Natural England carrying out their long-awaited evaluation of Dorset's compelling case.
- National planning practice guidance (NPPG) allows a local methodology to be used for calculating housing need for the whole of a planning authority's area where there is a national park (i.e. not just within the area of the National Park) in place of the government's standard methodology.
- National Park designation would, therefore, offers the opportunity to develop a Local Plan for the whole of the Dorset Council area, based on a local assessment of housing needs and economic aspirations.
- A National Park would initially develop with Dorset Council and others a Partnership Management Plan.
- Dorset Council and the National Park would then work together to develop a shared Local Plan which would update the 2023/24 Dorset Council Local Plan. The National Park would contribute financially to the cost of the development and delivery of a shared LP by a joint planning team.

Dorset CPRE

- The Plan makes no reference at all to the proposal for a National Park, which Dorset CPRE would wish to include as much as possible of rural Dorset and, subject to assessment, to align with the Dorset Council area.
- Dorset CPRE commissioned a report on the evidence for rural Dorset's potential for National Park status, and this was presented to Dorset Council, including the Portfolio Holder for Planning, in July 2019.
- The report concluded that there is extensive evidence that can be called upon to consider the four key attributes that would underpin a potential case for a National Park for rural Dorset (its natural beauty, breadth of cultural heritage, wildlife importance and recreational opportunities).

These attributes are in no way limited to the two Areas of Outstanding Natural Beauty or coastal areas.

West Dorset CPRE

- It is important that National Park status has been applied for. Dorset has (at the moment) great natural beauty, a huge cultural heritage, wildlife, recreational opportunities and very significant archaeology. There is the Heritage Coast and the Jurassic Coast, two Areas of Outstanding Natural Beauty and there are Sites of Special Scientific Interest and other areas of conservation. There are also areas of Ancient Woodland.

Cranborne Chase AONB Team

- Concern that here is not a discussion of the impacts National Park designation could have on the strategic development plans for Dorset in this consultation.
- Plan should also refer to the Glover Review of AONBs and National Parks.

Dorchester Town Council

- Notes that the plan does not reference the Dorset National Park.
- The Glover 'Landscapes Review' Report (September 2019) indicates that Dorset is a strong candidate for designation as a national park. This would include Egdon Heath as part of Thomas Hardy's landscapes.

Portland Town Council

- Supports the creation of a National Park in Dorset. We would encourage the designation of Portland as a UNESCO Global Geopark.

Puddletown Area Parish Council

- We note that the local plan does not reference the Dorset National Park.

Beaminster Town Council

- There is talk of a Dorset National Park – this would add weight to preservation however it could displace need as it would bring in other constraints.

Symondsburry Parish Council

- Proposal to introduce a National Park status to a large area of the Jurassic Coastline and AONB in the southern part of the county – query whether this has been considered in the plan.

Lyme Regis Town Council

- The council is far from convinced about the case for or merits of a National Park for Dorset; particularly as Lyme Regis appears to be wholly contained within it. It has been suggested that the council supports the proposal; this is incorrect.

Public response

- No mention of Dorset National Park - villages nearby to areas may apply to be part of DNP which would mean no windfarms in those areas.
- Support designation as a national park which would allow the council to set local housing targets.
- Suggest that the best way of guaranteeing the sustainability of the natural environment would be to designate Dorset as a National Park.
- I support the creation of a Dorset National Park so that the special qualities of Dorset can be protected, rather than eroded by the policies proposed by Dorset Council.

- Allow more building within the proposed Dorset National Park not just outside of that area.
- Proposal for National Park missing.
- A Dorset and East Devon National Park should be created.
- Dorset should be a national park.
- The area should be designated as a national park and preserved for future generations.
- The North of Dorchester development site is special and would be included in the Dorset National Park (if designated) so should be protected.
- Need to press for the Areas of Outstanding Natural Beauty and the Jurassic Coast to be designated as National Park.
- The housing numbers must be challenged as they are inappropriate to Dorset's potential national park status.
- Dorset is a rural county and should be a national park not a housing estate.
- Query whether proposals for a National Park have been considered as part of the plan making process.
- Respondent notes that the local plan does not discuss the implications designation of a national park might have for reviewing and possibly extending the designated nationally protected landscapes in the area.

2. What could the local plan do to mitigate climate change & help people adapt to its effects?

2.1. Climate and Ecological Emergency

Approach

Natural England

- Plan's vision should recognise the importance of the climate change and ecological emergency and be actively seeking measures to alleviate the harm that will otherwise be caused to local communities and wildlife.
- Plan should be setting out an ambition to achieve large scale land use change designed to provide multifunctional benefits for human health and wellbeing through access to natural green infrastructure, restoration of biodiversity, carbon reduction and sequestration, climate change adaptation and nutrient pollution reductions.

Environment Agency

- Support the inclusion of climate change matters in the plan, which is now the most important issue for us all to consider.
- Policies should enable the delivery of the outcomes and aspirations from the Dorset Council Climate and Ecological Emergency Declaration, and from national and international guidance and requirements, including addressing and delivering the aims and objectives of the Government's 25 Year Environment Plan.

Dorset Wildlife Trust

- Further work is urgent to ensure that the Local Plan is fully integrated with the action needed to address the climate and ecological emergency. Problem cannot be under-estimated and major changes are needed to the plan as a result to avoid even larger problems for future generations.

- Plan should take action to reduce emissions and enable adaptation, not just minimise the impact of climate change.

RSPB

- Welcome and support recognition in the plan of the climate emergency.

West Dorset CPRE

- More emphasis and solutions to the Climate emergency should be a priority.

Dorset Climate Action Network

- Need to insist upon the highest social and sustainability standards in all new development, and systematic use of preapplication processes in development control.
- The Council may not be able to achieve the goals of the Climate and Ecological Emergency Strategy and Action Plan, as a result of the strategy in the draft local plan.

Local Environmental Groups (non-statutory)

- Climate Change is the most urgent issue of the day and should be a priority for all forward planning.
- Yes, climate change is inevitable, but before we think about how to adapt to it, we first need to be certain that every part of the plan is focused on reducing climate change by creating a zero carbon county.
- Respondent consider that in order to address climate change, simplistic segregation into designated/undesignated areas should be replaced with:
 - in depth knowledge and understanding of the natural capital and ecosystem services of the land that are delivered now before they are subject to further change;
 - assessment of the impact of disruption to them, both at wider river catchment level and at the level of a more localised valley system as a whole such as the “Leigh Basin2”, East Wimborne/Colehill and the Waterloo Valley, Corfe Mullen – not just individual sites; and
 - assessment of where meaningful restoration of natural water courses and ecosystems can and should be delivered. (East Dorset Environmental Partnership).
- Too narrow in focus - does not comply with NPPF 174 - should include Section 41 species and habitats and species of local importance.
- Permanent habitats of all sorts (including permanent grasslands) are hugely important in carbon storage and need to be retained and protected in situ.
- Vital that precious environment is not concreted over and destroyed for all concerned - living here and visiting - should be the first priority of the Local Plan.
- The plan cannot keep pledge to “ensure that all new development incorporates ecological net gain”.

Community groups (non-statutory)

- Support for these policies and actions to address the climate and ecological emergency, and protect and enhance Dorset’s unique environment, increasing its natural capital. Welcome points relating to green space provision for health and well-being.

Developers/Landowners/Agents

- The wording within the Local Plan consultation misses several significant opportunities that would assist with the Council’s overall aim of carbon reduction and climate change mitigation.

Town and Parish Councils

- The section on Climate Change is nowhere near comprehensive enough. In the Dorset Main Plan there is a central referencing to Climate and Ecological issues.
- The issue of how Dorset can proceed into a post Climate and Ecological Emergency future is inadequately addressed.
- The town council 'looks to the local plan to ensure' that:
 - All new homes are built to zero carbon standards as soon as possible and by 2030 at the latest;
 - Use and repair of existing buildings is encouraged; and
 - Nature-based solutions to enhance climate resilience are fully embraced (Bridport Town Council).
- Create a green jobs list (e.g. upgrading insulation and heating existing buildings).
- The decline in biodiversity needs to be reversed in general, not just in protected species.
- Support for emphasis on environmental issues, support for achieving social justice and building resilience into communities, must diversify local economies, focusing on green jobs and circular economies.
- Requirement for policy relating to energy efficiency (insulation), eliminating use of fossil fuels for heating and hot water, and inclusion of local renewable energy generation. There is also scope for reducing the carbon footprint of construction techniques, with reduced use of carbon intensive materials such as concrete.
- Ecological emergency receives little attention and ecological networks should be added to the main environmental constraints map in Figure 1.2.
- Growth should be supported with appropriate climate change measures.

Public response

- Time for a change in thinking and approach to landscape, heritage, sustainability, travel, green infrastructure and energy generation.
- The plan correctly identifies that we have a climate and ecological emergency that must be dealt with but it is really advocating 'business as usual' and reads like many another local plan from the last couple of decades. There are only marginal concessions to the climate and ecological emergencies.
- The local plan should align with Dorset Council's Climate and Ecological Emergency Plan.
- Local plan should include a carbon budget.
- Need more specifics regarding how development will meet the climate emergency.
- The climate change and ecological emergency should underpin all local plan policies.
- The local plan should include a 'road map' which sets out how the targets/goals will be achieved and the strategies/policies in the plan should support a transition from reliance on non-renewable fossil fuels to renewable sources of energy which do not contribute toward climate change.
- The Council should prioritise reducing carbon emissions - with a target for 50% reduction by 2030.
- Plan should include policies that support a rapid and substantial decarbonisation of the local economy.
- The Local Plan should include a statement opposing fossil fuel development (including proposals for Wytch Farm and exploration in Puddletown).
- The Council should review priorities for investment and building in the context of the climate and ecological emergency.

- The local plan should not embed development that maintains or worsens carbon pollution.
- The proposed housing numbers are at odds with the Council's climate emergency and are unrealistic due to climate change.
- The CPRE say the housing targets are 47% above existing local plans, which are incompatible with protecting the landscape and natural and cultural heritage and the climate and ecological emergencies.
- Due to the exceptional circumstances of the climate emergency, the standard method for calculating local housing need should not be used.
- Employment land needs to be provided but should be considered carefully in the light of climate change.
- We need to encourage employment that mitigates climate change such as research and development, renewable energy, retrofitting houses, sustainable farming, ecotourism, repair and renewal, home working etc.
- Environment and climate change section sounds promising, hope that the Council will fulfil commitments.
- The Ecological Emergency receives little attention in the plan outside of the Environment Section.
- The plan needs to be clear that new developments must use the highest environmental standards/codes.
- Genuine sustainable development is not only concerned with economic growth in isolation.
- No evidence of a strategy for limiting damage to the climate. For example, there is no mandate requiring solar panels on new builds, there is no mandate for other technology solutions.
- Council needs to go much further and generate energy on every new building, not just save energy.
- The proposed Local Plan is not compatible with or give sufficient recognition to Dorset Council's declared climate emergency, zero carbon commitments and responsibility for protecting the natural environment.
- Is it enough that "The local plan will therefore sit alongside action plans" or should the local plan be informed by the action plans for the climate and ecological emergencies.
- Climate and ecological emergency have not been adequately tackled.
- The plan exacerbates climate and ecological emergency.
- The DCLP increases the problems of climate change through dirty air, carbon emissions and despoiled landscapes.
- Should focus on reducing and slowing climate change, not mitigating for it.
- The nearly 'made' PLP (Purbeck Local Plan) is out of date in terms of not dealing with Climate Ecological Emergency.
- The council should seek to preserve natural habitats because of their role as sinks for carbon dioxide.
- Protection of the environment should be at the heart of the Local Plan.
- The Council should seek to pioneer requirements around net gains to biodiversity and 'carbon gain'.
- The plan should be re-written to ensure a much stronger commitment to reducing vehicular use, providing the means for people to walk and cycle easily around town, building zero carbon homes, innovative and high quality architecture that will look good in 100 years' time, protecting wildlife habitats and enhancing the environment.
- Plan will soon become obsolete as electric vehicles replace carbon fuelled ones.

- Extending/delivering the remaining sections of the North Dorset Trailway is likely to encourage sustainable travel north to south through the council area and contribute to meeting the local plans strategic priorities and objectives (including responding to the climate change emergency through measures for adaptation to climate change).
- Strategic priority to take action to minimise impact of climate change but proposing development in areas lacking public transport.
- The Plan perpetuates ‘business as usual’ for another 17 years when there is urgent need to change to a net zero carbon economy by 2030.

Holistic approach

Cranborne Chase AONB Team

- A more strategic & holistic approach should be taken to the ecological emergency in the LP.
- LPAs are not expressly considering the current ecological crisis holistically, and then only by addressing individual topics, such as biodiversity gain.

Dorset AONB

- Concerning the references to the declaration of a climate emergency as a strategic priority, with the associated references to topics such as nature recovery and sustainable development, it is suggested that there are opportunities for more substantial further statements throughout the Plan, to create a ‘golden thread’ that runs through the document.

Local environmental groups (non-statutory)

- The plan has an unsatisfactory fragmented approach to climate change.
- Climate change should inform all policies.

Public response

- Dorset Council needs to take a more proactive and holistic approach to the future of the county, in view of the Climate Emergency.
- Tackling climate emergency should be better embedded in the plan.
- The local plan should adopt a more co-ordinated approach to addressing this issue.
- The climate and ecological emergency should underpin every policy in the local plan.

2.2. Carbon budgets - pathways, and trajectories

Targets for CO₂ emissions

Environment Agency

- Recommend the local plan includes a commitment to reduce, or set targets for, CO₂ emissions and other climate change parameters.

Dorset Wildlife Trust

- A summary of the climate change impacts of the local plan needs to be included.

RSPB

- Separate out the commitment to take action to minimise the impact of climate change, from actions to reduce emissions, so the plan is clear on which is which.

Public response

- The plan should lead through a strategy to achieve net zero emissions by 2050.
- Climate change targets for all developments should ensure housing is energy efficient, carbon negative and positively affecting wildlife and biodiversity.
- At the Climate Ambition Summit in December 2020, Boris Johnson called for a reduction of Greenhouse Gases (GHG) but 68% by 2030, in line with the Climate Change Committee Fourth carbon budget. This aim should permeate the entire plan for 2021-2038.
- No houses should be built if they cannot meet a net zero target.
- The Plan needs specific commitments on how development will meet low carbon and environmental goals.

Carbon budget

Dorset Wildlife Trust

- A carbon budget for the plan needs to be examined, looking at the balance between policies that allocate land for 30,000 new homes and those that will reduce emissions and enable land use change that captures carbon long-term.

RSPB

- The plan or supporting documents should provide an estimate of the carbon budget associated with plan policies.

Town and Parish Councils

- Should include policies that introduce a requirement to audit the carbon dioxide emissions connected with development and to take this into consideration.

Public response

- A compulsory unambiguous Carbon Accounting system should be included in this plan.

Roadmap

Public response

- Include a road map for achieving net zero greenhouse gas emissions by 2050 (the roadmap should intermediate targets for a 50% reduction by 2030 and a 75% reduction by 2040).
- Each policy in the Local Plan should quantify the contribution it will make to targets set out in those action plans (amended to provide clear roadmaps to zero emissions and reversing the loss of wildlife).
- The Plan should include timescales for delivering the changes needed.
- This statement should refer to the need for rapid reduction in greenhouse gas emissions, as required by law and should convey the 'emergency' nature of the climate and ecological crises.

2.3. Renewable Energy

Renewable Energy

Town and Parish Councils

- Should insist on renewable energy rather than just supporting it.
- All new development should incorporate renewables including EV.
- Nothing about renewable energy or alternative heating systems.

- Support small scale local energy production.
- support community groups to set up small scale producers, do everything we can to support this and provide the infrastructure to facilitate this.
- Support Town/Parish Councils through grants for renewable energy sources - allow town and parishes to access the procurement power of larger groups.
- All new homes must have renewable energy sources installed such as heat source pumps (eliminate gas boilers) and be insulated effectively (regardless of cost).

Local environmental groups (non-statutory)

- Renewable energy should be central to the Local Plan.
- Solar panels are preferred to be on roofs rather than in the open countryside.

Public response

- Support renewable energy development at all scales.
- Land should be identified of a size to make us energy self-sufficient by the target date.
- The development of renewable energy of all kinds should be encouraged.
- Could be significant expansion of solar energy but not focus on it to the exclusion of others.
- Renewable energy should be put across county, not just to support new developments.
- Suggested that Renewable Energy infrastructure is included alongside (or offset) all new Housing and Employment developments.
- Respondent suggests that we need onshore wind and solar pv (and thermal), while larger projects are being developed out to sea. And that we should also consider tidal energy.

Green Energy

Town and Parish Councils

- Policy should require the use of green energy in new buildings.

Public response

- Invest in green energy and green innovation.
- Planning permissions to include green energy.

Other energy sources

Public response

- Hydrogen should be considered for domestic heating.
- Consider small-scale hydroelectricity.
- Consider ground source heat pumps.
- Explore tidal energy and offshore wind farms.
- The most effective action for Dorset to mitigate climate change would be to actively support an off shore windfarm as proposed in the 2014- 15 Navitus Bay offshore windfarm planning application – considered a lost opportunity, 900 MW would've decarbonised Dorset, Poole and Bournemouth.

2.4. Buildings and assets

Design standards

Town and Parish Councils

- Require sustainable building design principles to be applied to all new development to minimise environmental impact.
- Consider zero car parking provision with new housing.

West Dorset CPRE

- Need for properly insulated houses, with solar panels on roofs and geothermal heating.

Local environmental groups (non-statutory)

- Inclusion of policies on actions such as broadband and electric vehicle charging are welcomed.

Public response

- The principles of 'good design' needs to be far more stringently defined.
- The plan should insist on the highest sustainability design standards for all new buildings.
- Importance of solar panels on new developments.
- Should make it mandatory for new homes and business premises, including extensions, to have provision for heating and ventilation using sustainable renewable energy sources, and a high standard of insulation.
- Permission should be granted based on improved water use, recycling, insulation, heat conservation and recycling.
- Concern about the mixed messages of taking care of the environment and then building many houses that are not yet regulated with new outfits for heating, building materials etc.
- Timber framed, minimal concrete and no wet trades or bricks.
- Consider nature friendly neighbourhoods, network of walk/cycling paths, access to public transport.
- Layout site to maximise passive heat gain and potential for solar energy.

Building regulations

Town and Parish Councils

- Review of NPPF guidelines and Building Regulations needs to be undertaken with the Climate and Ecological Emergency leading the changes.

Public response

- Local Authorities are entitled to set higher building energy efficiency standards than as mandated by Part L of the building regulations and many councils are making big changes through their local plans.
- There is not enough about building standards and moving Dorset's new buildings towards zero carbon construction & zero-carbon running costs.
- Recommended that the BREEAM Home Quality Mark (HQM) of, at least, 1 star is Mandated for ALL new build.
- Suggestion of using Passivhaus standards as a benchmark.

Street lighting

Public response

- Limit streetlights to whether there is an absolute need.
- No unnecessary outdoor lights are used anywhere within the Council's remit.

Retro fitting existing homes

Town and Parish Councils

- The local plan should make references to improving the sustainability of historic buildings.
- Older properties need assistance to upgrade to make them more environmentally friendly, so grants/funding should be made available and reliable technical support.
- Disagrees with the historic environment being placed as a higher priority than climate change.

Public response

- The council should seek to improve the sustainability of the existing housing stock.
- The local plan should include a policy which requires applicants to prepare a Circular Economy Statement when their proposals involve demolition of existing buildings.
- Where is the plan to replace older housing stock which is never going to be suitable for the 21st century with modern, insulated homes?
- Existing buildings should be retrofitted to make the more environmentally sound.
- The biggest waste of housing in England today is empty homes.

2.5. Food & drink

Food security

West Dorset CPRE

- Farmland is a key component of the 'green infrastructure' that helps counter climate change, and a significant source of valuable wildlife habitat as well as being the fabric of West Dorset's landscape.

Natural England

- Plan should include a policy on the importance of the roles performed by the area's soils.
- Strategic scale Agricultural Land Classification (ALC) Maps are available.

Public response

- Would have expected to see policies relating to preservation of agricultural land in the interests of food security.
- Protect farmland from development (including large scale wind turbines and photovoltaic panels).
- Protect soils on a landscape scale.
- Address agricultural practices that impact on the environment.

2.6. Economy

Green economy

Public response

- 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”.
- No reference to a green economy and zero carbon, need to focus on circular economy.
- The vision embedded in the current document does not steer the County into a low carbon future of energy efficient housing, ‘green economic development’ and carbon free energy generation and use.
- Should include policies which support a transition to low carbon lifestyles and businesses.
- Prevent industries from exacerbating pollution levels and encourage and help improvements in emissions of all kinds.
- Continued economic growth and addressing the climate change emergency are not mutually compatible objectives.
- Why are you encouraging job creation at Winfrith - which is miles from any settlement?

2.7. Waste

Waste Incineration

West Dorset Friends of the Earth

- Plastic will be the primary source of fuel for an incinerator and will provide a lifeline to single-use plastic producers to continue manufacturing their largely unnecessary product.
- Need to reduce plastic manufacture will mean that incinerators will need to find fuel outside the county (and perhaps the country) as fuel supplies dwindle.
- No new incinerators.

Public response

- Consider bringing incineration of waste to the beacon hill site to produce energy rather than burying it.
- Planned incineration of waste is not taking actions to minimise the impacts of climate change - emissions are second only to coal burning. Plan must explicitly state no waste incineration will be permitted.
- Waste disposal operations should be improved to help reduce pollution.

Recycling

Public response

- Pollutants should be kept to minimum and local rubbish disposed of locally, should prioritise health of residents.
- Good recycling areas essential.
- Excessive use of plastic should have penalties.

2.8. Water

Water resource

Environment Agency

- The plan should address the pressure on water resources and the need to improve our collective drought resistance.
- Water resources pressure will build as the climate changes and it is unsustainable to rely on water companies to solve the problem by organising additional supply.
- We suggest including a phrase such as 'water frugality' to show that Dorset will strive towards low water use as part of becoming resilient to climate change.
- Reducing water use is also a carbon saving as less energy is used in the supply of fresh water and treatment of waste water.
- We would encourage a specific water use limit to be set within this policy document. 95 litres per person per day would be a recommended level.

Flood risk

Local environmental groups (non-statutory)

- Need to address avoiding increasing carbon emissions and avoiding flood risk.

Public response

- Protect water courses on a landscape scale.
- Dorset must implement adaptation measures such as avoiding flood risk.

Water pollution

Public response

- No mention of sewage flowing into the river Stour - plan mentions keeping 'rivers clean' but they are already dirty.

2.9. Natural Assets

Carbon Sequestration

Natural England

- Natural England supports the link between carbon sequestration and protecting and expanding green infrastructure. However, this should not be solely related to woodland and forest planting, but expanded to include unimproved grasslands, wetlands and heathlands, (particularly peatlands) all of which provide substantive carbon sequestration rates along with other benefits.

RSPB

- Agree carbon sequestration is an important adaptation measure – paragraph 1.3.3.
- The plan should identify measures to offset the carbon costs of construction of new houses and development on employment land.
- The plan should also acknowledge the carbon storage value of buffer wetlands in catchments such as the Frome, and opportunities to link the need for nitrate mitigation arising from new housing in Dorchester.

- Strongly recommend that the plan endorses the ‘right tree in the right place’ approach when considering any carbon sequestration programme.

Public response

- Development is likely lead to increases in green house gas emissions (through disruption to carbon stores, loss of capacity for habitats to store carbon in the future and emissions connected with construction/use of development).
- Locally-grown timber within buildings would capture carbon and is highly sustainable.

Biodiversity

Dorset Wildlife Trust

- It is a huge challenge to achieve the level of change planned without leaving it impossible to meet climate change targets or reverse the decline in wildlife and inevitable that Dorset will become less special.

Dorset Catchment Partnership (Wessex Water)

- The draft Plan is light on incorporation of recovery of the natural environment as part of the Council’s response to the Climate and Ecological Emergency recently declared. The Local Plan must set an ambitious goal to deliver significant Nature Recovery, improvements in habitats, and achieve Biodiversity Net Gain.
- We suggest that the Local Plan would be a good way of the Council demonstrating support for catchment-scale, nature-based solutions, e.g. supporting natural capital trading, constructed wetlands or natural flood management, and that this should be embedded in all aspects of the plan in relation to development and mitigating its impact on the natural environment.

Developers/Landowners/Agents

- Policy should emphasise the support of developments which would look to restore and protect existing nature conservation sites.

Town and Parish Councils

- Describes the balance between encouraging sustainable development and conserving the natural/historic environment.

Public response

- There is very little on the environment and climate change and nothing on biodiversity.
- Involve wildlife, environmental charities as stakeholders.
- The spatial allocation for Nature Recovery land-use should be made implicit at the same time as land-use for housing and workspace, in line with the Dasgupta Review and the Prime Minister’s commitment to protect 30% of UK land for biodiversity by 2030.
- No evidence of ecological gain in specific development allocations.
- Wildlife corridors through the gardens.

Tree Planting

Forestry England

- Planting and managing trees, forests and woodlands so that they are fit for the future must also be part of the response to climate change.

Cranborne Chase AONB Team

- Trees and woodland are important for adaption to the impacts of climate change.

Public response

- Tree planting should be undertaken on all developments, not just replacement trees but doubling the number.
- Concern with loss of natural capital and environmental losses - opposite to government aims of using land more sustainably, creating new habitats, and planting more trees.
- Where homes are developed on greenfield sites, they should be integrated into the natural environment with maximum habitat and tree preservation.

Landscape

Cranborne Chase AONB Team

- We are very concerned that the focus is limited to biodiversity and not the wider aspects of landscapes.

Dorset AONB

- Widened environmental strategic aim that includes landscape conservation and enhancement, given that so much of the Plan area is subject to nation/international-level landscape and ecological designations.

Public response

- The environment is Dorset's greatest asset.
- Planning balance between the impacts of development generating renewable energy and landscape/heritage considerations needs to be reviewed.
- Obsession with heritage and landscape alone is no longer sustainable.

Agriculture

Public response

- Concerns with environmental impacts of bio-fuels, and mono-culture of maize - large amount of land required for generating electricity compared to solar.
- Priority needs to be also given to reducing energy consumption by improving buildings, reducing travel, decarbonising agriculture etc.

2.10. Transport

Traffic and transport

West Dorset Western Area Transport Action Group (WATAG)

- The Local Plan must offer a much bolder vision - in particular a much more ambitious, zero-GHG approach to transport taken over the lifecycle of vehicles and infrastructure.

Local environmental groups (non-statutory)

- In order to reduce car use, houses should be built near valid employment centres and the performance of fast-moving transport links, i.e. new housing should be allocated along strategic cross County routes.

Public response

- The plan needs an integrated transport plan to avoid unnecessary private car journeys.
- Better road network to reduce queuing traffic and pollution.
- Larger/more roads needed to reduce congestion and limit the impacts of climate change.
- Introduce a 'no-idling' law for all vehicles locally.
- Restrictions / limitations on traffic flows and volumes will go some way towards meeting targets.
- Motorcycle routes.
- Reduce parking.
- Increase car parking charges.

Active travel

Town and Parish Councils

- Doesn't provide any real vision of how people will be made or persuaded to 'active travel'.
- West Dorset being a predominantly rural area safe cycling does not become a viable mode of transport and residents rely heavily on private transport.
- Should prioritise active travel over cars.
- Lower speed limits in villages where there are no footpaths.
- Rural footways need reviewing as some landowners are blocking pathways.

Public response

- There is not much about urban design and new estate design to encourage active travel & discourage private vehicle use for short journeys (such as the school run).
- Better off road, linked up dedicated cycling routes.
- Provide proper support for utility (not leisure) cyclists.
- More safe routes and paths for recreation and school.
- Make pedestrians a priority.

Public transport

Town and Parish Councils

- In some regions of Dorset there is a distinct lack of public transport including vital links to the national rail network.
- Digital and electric transport advances could support more development in rural areas.
- No real explanation of what focusing travel onto public transport options means.

Public response

- Lack of strategy for improving public transport.
- Provide sustainable train and tram links.

Air pollution

Public response

- Dorset has some of UK's most polluted air which costs lives and impacts childhood development.

2.11. Other issues

Divesting from Fossil fuel investment

West Dorset CPRE

- Need to reduce carbon emissions and consumption.

Town and Parish Councils

- Local plan does not have policies relating to fossil fuels.

Public response

- Fossil fuel developments, such as the proposed extensions of Wytch Farm and drilling at Puddletown should be opposed, as they are not compatible with Dorset's aim of zero carbon.
- There is no drive to stop using fossil fuels.
- The Plan does not contain any indicative policies on fossil fuel development applications. Dorset has attractive target geology (viz. the Puddletown proposal and Wytch Farm).

Housing growth

Dorset Wildlife Trust

- Concern that proposed level of housebuilding represents a huge challenge to achieve that level of growth without leaving it impossible to meet climate change targets or reverse the decline in wildlife.

Dorset Climate Action Network

- Suggestion to rethink the mathematical basis of the development strategy – proposed scale of development will impede the pursuit of the Council's own Strategy and targets for reduction of greenhouse gas emissions and delay the process of mitigation and adaptation.

Public response

- Policy allocations are not an appropriate response to the climate change and ecological emergency.
- Carbon emissions from the delivery of development supported by the plan is likely to outweigh any planned reductions.
- Conflict between NPPF requirements for additional housing for the growing population and, wider biodiversity impacts.
- Small sites in both rural and urban locations lend themselves to innovation in housing which could include self-build.
- Proposed new homes which haven't yet been granted planning consent should be put on hold until all the considerations raised have been sorted out. These important matters need to be addressed before the plan is adopted.
- Use development contributions to achieve environmental aims.

Prioritise brownfield sites

Public response

- Brownfield sites are a more sustainable option than green field.
- Should be less emphasis on new big housing estates and more on brownfield sites and small village development to meet local needs.

Behaviour change

Public response

- People want to contribute but need assistance and reliable advice from an independent, trusted and authoritative body, i.e. Dorset Council.
- The only emergency we have is to get people to be satisfied with what they have, stop showing off at schools and wear clothing items until they wear out.
- The council needs to be resourced/have processes capable of responding to the climate change emergency.
- It is sensible to conserve natural energy sources and recycle what we can. That is what the population of the country has done since time began. The only changes are greedy manufacturing companies and the selfish attitude of the younger generations in the one-upmanship of ownership of modern tech e.g. Mobile phones etc. and throw away fashion.
- The Council should continue to lead by example with all the energy saving measures it has started and commit to having an all-electric fleet of vehicles as soon as possible.

Future resilience

Dorset Climate Action Network

- We urge the Council to ensure that all new dwellings are resilient in the face of climate change.

Town and Parish Councils

- Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.
- Look pro-actively to ensure that policy is future proofed to quickly take advantage of new energy sources, green infrastructure developments, and green building design and transport codes.

Public response

- Need to ensure health and wellbeing of all residents through clean air and water, opportunities to engage with natural ecosystems, suitably affordable, good quality, energy-efficient homes & workplaces, access to clean energy, access to sustainable public transport and to safe walking and cycling routes, and protection from the impacts of rising temperatures and extreme weather.
- Plan should ensure that nature-based solutions to enhance climate resilience are fully embraced.

Natural Capital

West Dorset CPRE

- There is no attempt in the Local Plan to make protection of the 'natural capital' of West Dorset a priority in the face of pressures for development.

Public response

- Financial assessment is incomplete and does not take account of natural capital.

Other strategies

Wessex Catchment Partnership (Wessex Water)

- Chapter should reference the recent Local Nature Partnership position statements on climate change mitigation and adaptation.

Dorset Wildlife Trust

- The Plan needs to be much more closely aligned with other relevant strategies including the Climate and Ecological Emergency Strategy.
- Reference to other strategies developed by organisations that are equally relevant to the Plan should be made, e.g. Nature Recovery Networks.
- Key elements of the Dorset Local Nature Partnership Vision and Strategy (2014) and forthcoming Local Nature Recovery Strategy should be incorporated into an overall Dorset Plan.

South Western Railway

- Aligning the plan better to the Western Gateway Sub National Transport Board emerging transport strategy and in particular the completed rail strategy and the Network Rail CMSP for the West of England line and the Dorset Strategic Study.

Climate change scepticism

Public response

- Nothing you or anyone else in the world can do can make one iota of difference to the so-called climate change emergency.
- This non-emergency is a political construct to control the populations of the world.
- Against climate emergency.

3. Policy ENV1: Green Infrastructure

3.1. Approach

Definition of green infrastructure

Natural England

- Clarify it doesn't include formal sports.

Environmental Groups (non-statutory)

- Provide advice on what green infrastructure should deliver.

RSPB

- Support this policy despite misgivings about how the plan will enable significant enhancement of priority habitats within the wider ecological network.

Town and Parish Councils

- Should include safeguarding Local Gaps, Green Spaces and view corridors.
- Farmland should be included - permanent pasture plays a significant role in carbon sequestration.

Ramblers

- The plan would benefit from a better definition of "green infrastructure."

Public response

- Widen the scope of Green Infrastructure.
- Does green infrastructure include RoWs?

- GI should include subways and bridges as safe road crossing for wildlife.
- Green infrastructure aims will need specific sites and hedges to be designated in as many cases as possible.
- Replace “Green infrastructure” with “Natural Environment”.
- GI should take account of existing local landscape designations, e.g. LLI.

Definition should include blue infrastructure

Environment Agency

- Should include blue infrastructure, which also considers the benefits and ecosystem services provided by rivers, watercourses, ponds and the coast.

Historic England

- Blue and green infrastructure networks can also be used to conserve heritage assets.

Environmental groups (non-statutory)

- Recommend that a reference of blue infrastructure is included under the term ‘green infrastructure’.

Wessex Water

- Expand to include support for blue infrastructure and developments which improve the BI network or status.

Dorset Catchment Partnership (Wessex Water)

- Blue infrastructure should be included.

Terence O’Rourke for Bloor Homes

- The policy approach requires cross-reference with topics including ‘blue infrastructure’ planning, nutrient neutrality, and the importance of GI for place making generally.

Public response

- Should include blue infrastructure.

Paragraph 3.2.2 - Eco-system services

Natural England

- Should be given an economic value.

Environment Agency

- Real opportunity to link with and deliver against Carbon Net Zero targets, particularly through carbon sequestration.

Cranborne Chase AONB Team

- Concern with a misunderstanding of the concept in terms of ‘ecosystem services’ relating to children’s playgrounds and cycleways.

Environmental groups (non-statutory)

- Clarify the difference between green infrastructure and ecosystem services and provide definition of ecosystem services. Not all GI provides an ecosystem service.
- Welcome commitment to ecosystem services but constructed features are not an ecosystem service.

- Ability to provide ecosystem services and benefits dependent upon design, species used and management.

Wessex Water

- Expand section 3.2.2 to include health benefits and improvements to water quality.

Public response

- Paragraph 3.2.2 - Should include provision of sustainable timber as well as food.

Paragraph 3.2.3 - Benefits of green infrastructure

Woodland Trust

- All developments should integrate quality green infrastructure from the earliest stages to maximise multiple benefits.

Figure 3.2 Types of green infrastructure and related policies

Natural England

- Expand list to include designated local nature reserves.

Environment Agency

- Should include Stour Valley Park in the examples of Green Corridors text.

Cranborne Chase AONB Team

- Concerned that the types of green infrastructure and policies set out in figure 3.2 seem to have an urban or urban fringe focus with no recognition that the AONBs, as nationally designated landscapes, comprise a vast strategic green infrastructure resource.

Environmental groups (non-statutory)

- All types of green space should contribute to climate and ecological emergencies including sports pitches, parks or green corridors.
- Clarify definitions in table 3.2.
- Use examples that form a network, not just isolated pieces of greenspace- NPPF definition.
- The description column in table 3.2 is incomplete or incorrect. “Natural and semi-natural green spaces” are listed as designated wildlife sites – though there is no reason a green space cannot be designated for wildlife.
- Recommend that green corridors could include green walls/roofs (link to fig 3.7 and 3.15). Also want “community woodland creation” for Carbon and drainage purposes.
- Importance of farmland as green infrastructure.
- Unclear whether table 3.2 is supposed to list green infrastructure AND nature conservation designations, or just the former.
- Constructed features such as cycleways are not an ecosystem service nor are indoor leisure centre facilities (table 3.2) part of Green Infrastructure.
- Examples given in Table 3.2 are largely individual elements and do not demonstrate examples of the required network of multi-functional green space and other green features, urban and rural, which can deliver quality of life and environmental benefits for communities.

Local Access Forum

- Strengthen references to green corridors to seek early completion of the North Dorset Trailway, the Castleman Trail and the River Brit corridor as full end-to-end routes.

Town and Parish Councils

- Concerns with the mention of Sherborne Abbey Close and the 'slopes' in Shaftesbury in relation to coastal change management areas – needs explaining.

Paragraph 3.2.4 - Incidental space

Public response

- Smaller green spaces should be identified and protected from development and supported in the policy.
- Informal greenspace should be protected under Env1 based on customary use rather than rely on designation through neighbourhood plans.
- Community should be allowed to adopt and manage a plot informally, with the support of town and parish councils and such plots protected under ENV1.

Paragraph 3.2.5 - Multi-functionality

Natural England

- Supports the multifunctional aspects of all green infrastructure within urban areas.
- Should be made a local plan requirement and apply at all scales, e.g. new road verges, public open space, cemeteries and SuDS. Will provide range of benefits, wildlife and ecological connectivity, carbon sequestration, improved air quality and health and well-being.

RSPB

- Welcome recognition of the value of maximising multi-functionality and value of delivering inter-site connectivity but no commitment to deliver.

Environmental groups (non-statutory)

- Support for the policy and approach of multifunctionality.
- We support paragraph 3.2.5 which stresses the need for multifunctional green spaces, and to get more out of spaces for the climate and ecological emergency.
- Paragraph 3.2.5, Recommend the inclusion of increasing soil carbon (soil carbon storage).
- Paragraph 3.2.5 - welcome recognition of the value in maximising multifunctionality and the value in delivering inter-site connectivity, but this is just a descriptor of what is valuable to do – lack of commitment to do these things.
- Concern with a reliance multifunctional approach to green infrastructure - 'greenspace' in general is not the answer to all ills.

Town and Parish Councils

- Alternative test for paragraph 3.2.5 proposed-whilst ensuring strong connectivity between sites and outwards to the PROW network, e.g. creation of green routes for both active travel and for recreation, thus supporting active living and healthy lifestyles for both physical and mental wellbeing. These will also create habitat, form wildlife corridors, and contribute to the landscape.
- Paragraph 3.2.5 - interconnectivity between sites of green spaces is more of an issue in built up areas and is an important matter to deal with.
- In rural locations this is less of an issue except where opportunities arise to provide wild-life corridors across what might be principally land farmed in a monoculture fashion.
- Wide road verges that are allowed to naturalise can help provide these corridors and which will benefit invertebrate species.

- In the second bullet tree planting needs to focus on planting a mix of trees of native species rather than imported species.

Public response

- Create green routes for active travel and recreation, supporting active living and healthy lifestyles for physical and mental wellbeing. Will also create habitat, form wildlife corridors and contribute to the landscape.
- Add more detail on benefits of corridors/connectivity.
- Enable residents to grow their own food or have community plots within developments to be partly or fully self-sufficient.
- Additions of new wildlife sites and corridors to the existing ecological network which will serve to increase habitat, give access to nature, provide for sustainable drainage (SuDS) whilst allowing further opportunities for informal recreation.
- Increases to the biodiversity of recreational and amenity open spaces through tree planting which will serve to further enhance the enjoyment of those spaces by users for recreation, play and learning as well as providing shade and urban cooling.

Paragraph 3.2.6 - Strategic projects

Natural England

- We support the inclusion of the listed country and nature parks. The list should be expanded to include the Gillingham Royal Forest and Corfe Barrows Nature Park.
- Consideration should also be given to expanding the scope of the Gillingham Royal Forest initiative into a Community Forest Scale Project centred around the Blackmore Vale. Such a scheme would provide substantive multifunctional benefits.

Dorset Wildlife Trust

- Paragraph 3.2.6 - DWT is pleased to see inclusion of Nature Parks within the list of strategic projects. We would suggest that the following are also included:
 - Gillingham Royal Forest - situated between Gillingham and Shaftesbury, the former deer park offers improved wildlife, landscape and recreational opportunities
 - Corfe Barrows Nature Park - situated to the north-east of Corfe Mullen with areas of woodland, heathland and meadows offering recreational opportunities.
 - Wild Purbeck Nature Improvement Area – one of 12 original NIAs recognised by Defra, the initiative brings together landowners and partners to deliver large scale initiatives to improve ecological connectivity and biodiversity.
- There are though many other potential large-scale projects such as in the Frome Valley, which have huge potential for both biodiversity gain and green infrastructure.

Environmental groups (non-statutory)

- Add the following to strategic sites: Gillingham Royal Forest, Corfe Barrows Nature Park and Wild Purbeck Nature Improvement Area.
- Should we be focussing more on potential new sites rather than existing strategic sites – the aim is to increase provision.
- Paragraph 3.2.6 includes projects that have been in existence for many years: for example, Avon Heath Country Park, Moors Valley and Durlston have been operating successfully for decades – economic benefits and tourism benefits.
- Paragraph 3.2.6 – Include Gillingham Royal Forest within existing sites.

- Paragraph 3.2.6 - should list where new opportunities for Green Infrastructure will be required.

Town and Parish Councils

- Paragraph 3.2.6 - most of these are in the south and east of the County. We would suggest that some projects in the townships across the County would benefit from similar types of project.

Public response

- There are no proposals for multi-functional green spaces in N Dorset – with large increases in population forecast this should be considered to alleviate pressure on sites such as Duncliffe Wood.
- Support large scale projects to provide accessible green and open space.

Paragraph 3.2.6 - Stour Valley Park

Wimborne and District Angling Club, Chrsitchurch Angling Club and Ringwood and District Angling Association (response prepared by Mike Hirsch)

- Not clear how the green infrastructure projects (including the Stour Valley Project) referred to at Paragraph 3.2.6 will be delivered. (There are not references to in Policy ENV1).
- The Stour Valley Project comprises a 'regional park' which would have significant requirements for services e.g. car parking. Access to land in the project area would need to be managed to avoid adverse impacts (increase in access and use over the pandemic led to widening and degrading of footpaths and cycleways).
- Further details of funding and resourcing with staff are needed before interested parties could be confident that the Stour Valley Project could be successfully delivered and maintained/managed in the long term.
- The Stour Valley Project should:
 - Include details of restoration measures;
 - Reduce pollution in all its forms (including nutrients and micro plastics);
 - Invest in mitigation or removal of obstructions;
 - Be informed by detailed and comprehensive baseline data on the River Stour valley (the angling clubs can assist in providing this data).
- The angling clubs consider that there needs to be a specific local plan policy relating to the Stour Valley Project and that without this policy the local plan is unsound (the representation includes further details of suggested wording for a policy).

Bournemouth, Christchurch, and Poole Council

- Welcome and support inclusion of the Stour Valley Park as a strategic project. The Stour Valley Park is a strategic priority for BCP and we will continue the partnership work with Dorset Council and other bodies to deliver this important project.

National Trust

- Supportive of the Stour Valley Park, and policies and mechanisms to support the overall vision and its practical implementation.

Environment Agency

- Stour Valley Park reflects the bigger needs of the catchment as a whole and contribute to landscape scale ecosystem improvements.

Dorset Catchment Partnership (Wessex Water)

- Support inclusion of Stour Valley Park, which should be underpinned by quality baseline data to inform design.

Local Access Forum

- Should contain a firm commitment to complete Stour Valley Park as a high-quality walking/cycling/riding end to end route, engineered to meet access-for-all standards.

Paragraph 3.2.7 - Improvements to the green infrastructure network

Environmental groups (non-statutory)

- Paragraph 3.2.7 - should read “Development should seek any opportunities to improve the way the green infrastructure functions, including the delivery of multifunction benefits, such as in new Nature and Country Parks, and linkages”.

RSPB

- Paragraph 3.2.7 - while we welcome the statement that development ‘should’ take opportunities to improve GI functions, it is unclear from the plan what the scale of opportunity might be, where priority areas are and how this would be secured through developer contributions.

Cranborne Chase AONB Team

- Existing Public Rights of Way do not appear to figure at all highly in the green infrastructure statement. Paragraph 3.2.7 could be expanded to include that link up Rights of Way that come to an end at busy roads and to provide safe routes, and access to wider green space.

Paragraph 3.2.8 - Long-term management and protection

Natural England

- Supports the need for securing the long-term management of new and existing green infrastructure (GI) and for protecting it from future development.

Amphibian and Reptile Conservation

- Support paragraph 3.2.8.

East Dorset Environmental Partnership

- Supports the requirement to secure appropriate long-term management of all GI.
- The increase in visitors to the countryside during the pandemic may be a continuing trend which needs resourcing.
- Our existing PRoW network will not withstand the heavier use that is being made of it now nor the increased impact of storm events and poor drainage.

Cranborne Chase AONB Team

- Paragraph 3.2.8 - Suggest engagement with AONB partnership in relation to conditions and legal agreements.

Town and Parish Councils

- Paragraph 3.2.8 - S106 agreements are narrow in their focus and are used to mitigate the negative impacts of a development - use of Conservation Covenants would be one way of

resolving this issue but Unilateral Undertakings should also be explored in addition to other types of agreement.

- One off commuted payment by developers would normally be time limited so other forms of agreement should be explored.

Public response

- How will long-term maintenance be secured? Suggest all green spaces transferred to council with sufficient funds.
- GI sites need management plans and monitoring.

3.2. Policy

Policy approach

Environment Agency

- Agree with the suggested approach and support the inclusion of green infrastructure policies.

Environmental groups (non-statutory)

- Support for the policy despite misgivings about how the plan will enable significant enhancement of priority habitats within the wider ecological network.
- Need for new sites which fill in the gaps between existing ones.
- Brownfield sites are often more biodiverse than 'greenfield' sites (esp for bees and other invertebrates) and shouldn't be dismissed as easy opportunities for development.
- Should require green infrastructure provision to be ecologically coherent within and across the site, and to enhance the wider ecological network.

Gladman

- Policy should be more flexible to allow for loss of GI, e.g. hedgerows, where necessary to deliver the scheme.

Lichfields on behalf of Bourne Leisure

- Future policy should provide the flexibility to provide enhancements that are appropriate to the development's type, scale and location - not a "one-size-fits-all" approach.

Terence O'Rourke for Bloor Homes

- The Local Plan lacks a strategic approach to GI that is fully integrated to the spatial strategy.
- Promotes Lytchett Countryside & Villages as a means of delivering large scale strategic GI along with new homes.

Town and Parish Councils

- Protection and enhancement of green infrastructure should be treated as a priority.
- Infilling with defined development boundaries should be limited to avoid re-development of green infrastructure.
- Policy should explicitly promote the 'brownfield first' housing policy.

Public response

- Too weak/woolly – needs to be strengthened, including enforcing.
- Should be a requirement, not an expectation, i.e. mandatory.
- Should be strengthened changing 'should' to 'will' and 'expected to' to 'will'.

- There is no indication provided as to the need for green infrastructure and how it will be delivered.
- Could be extended to ensure that green spaces are provided wherever new housing or employment is proposed.
- GI should be free for public use.
- Any building (dwelling/ office/factory/depot) should have some form of green wall covering.
- Need to improve the environment through green corridors and reinstatement of ecosystem baselines - with employment and economic benefits.
- Insert paragraph with details of CROW Act land.
- Tree planting should be referenced in this policy.

Criterion I.

Environmental groups (non-statutory)

- Criterion I. Should the emphasis be more on multiple functions rather than one primary function.

Public response

- Policy should relate to the 'primary function' of GI defined in Figure 3.2.
- The primary function of any element of the original green infrastructure and the natural capital it provides (air quality improvement, flood mitigation, subterranean biodiversity, carbon absorption etc.) will be protected from the adverse impacts development causes.

Criterion II.

Mission Planning

- Clarification required – II what are the requirements.

Lichfields on behalf of Bourne Leisure

- Suggestion of amendment to the policy wording to recognise that not all parts of the existing infrastructure provide an equal or valuable function, and allowing developments to be assessed on its own merits.

Ramblers

- Developers should consult early with path user groups and parish and town council.
- Path user groups should be added to consultation list for planning applications.

Town and Parish Councils

- Should be phrased 'must' incorporate enhancements.
- Need more detail in the local plan to describe the process for engagement with local communities around delivery of green infrastructure.

Public response

- Policy to incorporate enhancements should be a requirement rather than an expectation.

Criterion III. - Strategic development

Cranborne Chase AONB Team

- There seems to be scope for interpretation in item III as to what is strategic development. It may be simpler to refer to major development.

Mission Planning

- Clarification required - III some smaller sites may not be able to deliver what seems to be required.

Town and Parish Councils

- Should be phrased 'must' include provision of sufficient green infrastructure.
- The requirements to deliver green infrastructure should be applied to all development and not just 'strategic' sites.

Criterion III. - Enhancing and connecting cycling and walking

Historic England

- Mention the importance of improving access to green infrastructure for all people.

Town and Parish Councils

- Ensure developments link to existing footpath networks and cycleways and are integrated with existing settlement.

Access organisations

- Any new paths should be adopted as public rights of way.
- Arrangements for protecting/managing/maintaining green infrastructure should include wherever possible, that any new access routes are dedicated as rights of way.

Public response

- GI network should provide linkage to, and extend, the existing RoW network for horse riders as well as cyclists and walkers.
- Insert new paragraph after 3.2.5 with details of rights of way network.
- Include adequate provision of accessible transport to green infrastructure where this is suitable or appropriate.
- Policy should include importance of improving access for all people including those with disabilities.
- Need to create links between/across RoW network.
- Important to improve access to assets for all including those with a disability.

Criterion IV.

Environmental groups (non-statutory)

- Policy ENV1 – iv) insert 'permanent' part of the green infrastructure network.

Criterion V.

Natural England

- New development located within easy walking distance of existing natural greenspace and publicly accessible nature reserves will benefit substantially by the presence of such facilities and should make a contribution to managers of site towards managing new visitors.
- Where the management of the green infrastructure is not already secured (e.g. through SANG payments) the development should be required to make a financial contribution appropriate to the scale of the development to the managers of the reserve / greenspace to cover these additional costs. This is particularly important where the nature reserves, or nature parks, are

run by charities that do not have secured income to cover the in-perpetuity management costs associated with new housing development.

National Trust

- Support monies raised via CIL and S106 agreements being directed towards green infrastructure and supporting the provision of and access to greenspace.

Environmental groups (non-statutory)

- Amend V to include 'land identified for green infrastructure will be safeguarded from future development'.

Ramblers

- Any new paths for walkers/cyclists/horse riders which are established within a new development should, as a matter of course, be adopted as public rights of way to ensure their long-term security.

Gladman

- Policy should allow offsite provision/financial contribution in limited circumstances where it meets the needs of the development and achieves a better outcome for the local community.

Town and Parish Councils

- Part V should be more specific/prescriptive in specifying a period time frame for maintenance/management.
- Part V - add time period, e.g. 'Adequate provision should be made for the long-term management and maintenance of the green infrastructure network for at least 30 years'.

Public response

- Strengthen part V – maintenance and management. Vigorous use of S106, CIL and Nitrate sensitive area levy.
- Need to secure significant funding for linking Rights of Way Network.
- Use developer contributions to meet wider aims.
- Biodiversity should be considered infrastructure so CIL could be directed towards restoring biodiversity.

3.3. Other issues

Accessible Natural Greenspace Standards (ANGSt)

Natural England

- Natural England is concerned that no reference is made to a minimum size requirement for the provision of green infrastructure in new development. Policy and supporting text should set minimum accessibility, quantitative and quality requirements for new green infrastructure. Natural England recommends this is achieved by adopting Accessible Natural Greenspace Standards (ANGSt) or replacement standards if revised, as a minimum requirement for new housing development. ANGSt includes the quantity, accessibility, quality and services standards for accessible greenspaces.

A strategic approach to maintaining and enhancing networks of habitats and green infrastructure

Natural England

- The plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. This should include detailed requirements for new areas of green infrastructure along with a review of existing to ensure that they are meeting the multifunctional benefits and thereby maximising their Natural Capital.

Allotments

Natural England

- Recommends the local plan includes a new section setting out the requirements for allotment provision, and other community food production spaces such as community orchards and the protection of existing facilities.
- Suggests that the local plan should include measures to promote allotment's benefits to wildlife for example the provision of fruit trees in each plot, permanent planting for pollinators, etc.

Heritage assets

Historic England

- May offer opportunities to conserve heritage assets, for their significance to be enhanced, and for improving public access, understanding and appreciation of heritage assets – add supporting text and update policy.

AONB Management Plan

Cranborne Chase AONB Team

- The opportunity should be taken to include a policy for developers to contribute to AONB Management Plan objectives when development is within an AONB or its setting.

Green/Blue Infrastructure Strategy

Environment Agency

- Recommend production of a Green/Blue Infrastructure Strategy/ Plan for Dorset.

Local Access Forum

- GI should be integral to the development, not an add-on. Recommend development of a more comprehensive strategy for scoping GI requirements and articulate early in design process.

Public response

- Existing public open space within all towns and villages should be protected within an overarching strategy to ensure that no developer or public body can build.

Nature Recovery Zones

Dorset Climate Action Network

- Need for a strong emphasis on Nature Recovery Zones.

Dorchester Churches Ecology Group

- Should designate Nature Recovery Zones to create wildlife corridors, river catchment management schemes and other measures to protect, extend and strengthen Dorset’s network of high-nature-value sites.

Woodland Access Standard

Woodland Trust

- Council should adopt the Woodland Access Standard.

Site allocations

National Trust

- The council should ensure that the development allocations set out in the draft Local Plan are able to fully accommodate the green infrastructure requirements of draft policy ENV1.

Environmental groups (non-statutory)

- The Council should consider requiring the inclusion of connected / intersecting greenspace in every development.
- Development will result in increased visitors to nature sites; SANGS and greenspace should be mapped as part of the plan allocations.

Terence O’Rourke for Bloor Homes

- Policy is generic and does not allocate or provide guidance to deliver specific GI projects – particularly strategic SANGs needed to satisfy the requirements of the Habitats Regulations.

Town and Parish Councils

- Council should take a more proactive role in delivering strategic green infrastructure.
- Council should attempt to deliver the strategic green infrastructure (for example allotments or new public rights of way to provide links between existing routes) that local communities want.

Public response

- Policy should include extension of GI where settlements expand by 10%.

Monitoring

Natural England

- Ensure new green infrastructure and habitat creation is monitored.

4. Policy ENV2: Habitats and species

4.1. Approach

Paragraph 3.3.1

Natural England

- Commitment should be extended to ensuring the Plan as a whole delivers an overall significant expansion and enhancement of all wildlife habitats - in line with the authority's declaration of a climate change and ecological emergency.

Figure 3.4

Natural England

- Note that numbers of designated sites will have recently changed – definitive numbers of each category of wildlife sites is sought from the Dorset Environmental Records Centre.

New Forest National Park Authority

- It should be acknowledged that there are internationally designated sites in close proximity to the Dorset Plan-area which will potentially be impacted by development within Dorset - including the New Forest SAC, SPA and Ramsar designations.

Cranborne Chase AONB Team

- Scope for misunderstanding the status of the Dorset and East Devon Coast World Heritage site and the Dorset and Cranborne Chase AONBs - AONBs are mentioned under the heading of hierarchy of designated sites and but then not included in fig 3.4.
- It should also be noted that the Cranborne Chase AONB is an International Dark Sky Reserve and that international designation is of particular importance.

Environmental groups (non-statutory)

- Wrong number of marine SACs – suggested amendments provided.
- Amend status of SNCI and designation process.
- Change name of Local Sites to Local Wildlife Sites for clarification.
- The ecological networks for Dorset require more work based on positive on the ground evidence.

Paragraph 3.3.3

Environmental groups (non-statutory)

- Change to read ...and the large number of protected and priority species...

Paragraph 3.3.4

Natural England

- Recommend the list includes the existing habitat restoration sites (as mapped by the Dorset Environmental Records Centre), including future sites identified for the delivery of biodiversity net gain.

Environmental groups (non-statutory)

- Paragraph 3.3.4 should read Priority habitats and species including, but not limited to, heathland, ancient woodland and trees, certain grasslands and wetlands.

Paragraph 3.3.5

Natural England

- Text should clarify that significant effects includes consideration of indirect effects, for example through the loss of supporting habitats, or loss of ecological connectivity.

Paragraphs 3.3.6 - 3.3.14 - European and international sites

Town and Parish Councils

- Paragraph 3.3.6 – query when SPDs will become available and how they fit the strategic planning framework.

Natural England

- Note that the plan will be subject to a Habitats Regulation Assessment which may identify additional sites where impacts are considered likely.
- Work will need to be completed before a definitive list at plan paragraph 3.3.14. can be provided of all the International Sites that will require a strategic solution.
- Advises that an additional paragraph is included highlighting the potential need for further strategic solutions to address in combination effects during the local plan period.
- Paragraph 3.3.8 - note bespoke mitigation packages need to be agreed with your Council, in consultation with Natural England.

East Devon District Council

- Paragraph 3.3.14 - It may be beneficial to see more detail included in respect of initiatives and mechanisms for mitigation delivery on and at the River Axe.
- It may be relevant to review assessment work under the Habitat Regulations to ensure that appropriate up to date references are made.

New Forest District Council

- Important to co-operate on cross-boundary issues to ensure that the impact of phosphates on the River Avon SAC is fully addressed.

New Forest National Park Authority

- The New Forest's internationally protected habitats are frequently visited by residents of Dorset - issue will need to be considered as part of the Habitats Regulations Assessment/Appropriate Assessment of the emerging Local Plan.
- Using the best available information, residential development within the catchment area/zone of influence of the New Forest's designated sites will require mitigation to ensure compliance with the Habitats Regulations.

Dorset Catchments Partnership

- Paragraph 3.3.7 - Planning for transport infrastructure should consider this environmental impact.
- Propose that the Stour and Poole Harbour catchments need phosphate protection acknowledging too; the Water Framework Directive status for both catchments shows failures for phosphate, which should be used in the Local Plan as a driver for improvements.

- The Fleet lagoon has also been identified as having issues with nutrients as well as recreation, and this should be acknowledged in order to drive improvements.

National Trust

- New residential development within 5km needs to be very carefully considered to avoid a 'locked-in' cycle where housing growth continues and recreational pressures increase over time.
- There may be scope for small-scale tourism development within 5km of the heathlands where a landowner can demonstrate that it mitigates or reduces day travel, and that the income generated can be used to directly support the Heathland SPD priorities.

Inspired villages

- It is recommended that Paragraph 3.3.7 is amended to allow for certain types of development that would lead to significant benefits to the heathland, that might not otherwise be possible.

Environmental groups (non-statutory)

- Paragraph - 3.3.7 The Plan does not consistently repeat the policy that caravanning, and camping is not allowed with 400m of heathland. In the Para 5.10.9 the term only 'should be avoided' is used.
- Paragraph 3.3.11 - Define the zone of influence for Poole Harbour or at least explain how this has been mapped – it is not clear how the zone is defined.
- Paragraph 3.3.13 – Chesil and the Fleet SAC interim measures will need to progress and be tightened up as planned housing progresses.
- Paragraph 3.3.14 - Supports the addition of further guidance nutrient management in relation to internationally protected sites. However we suggest that recreational pressure is also examined as well at this time.
- In respect to Paragraph 3.3.14, the respondent notes that further residential development could also affect nutrient pollution in the Solent and River Avon, and that there could also be significant recreational effects from residential development on New Forest habitat sites. (East Dorset Environmental Partnership).

Local community groups (non-statutory)

- We would like to draw attention to the Poole Harbour Nitrate Management Scheme (PHNMS).

Developers/Landowners/Agents

- The Local Plan lacks a strategic approach for habitat protection that is fully integrated with the spatial strategy.
- Need for a policy for SANGS, strategic heathland support area projects, nitrate neutrality.
- The DOR13 development to the North Dorchester site will provide a considerable reduction in nitrates and has the potential to provide considerable nitrate offset for other sites in the Plan.
- Recommend that Paragraph 3.3.7 is amended to include the wording 'unless in exceptional circumstances'.

Paragraphs 3.3.15 - 3.3.16 - National Sites

Natural England

- Paragraph 3.3.15 - recommends mention is made of the new Purbeck Heaths National Nature Reserve which covers 3,331 hectares of outstanding wildlife habitats.

National Trust

- There may be benefit in Dorset Council and Natural England supporting and enabling the creation of more landscape-scale NNRs such as the Purbeck Heaths NNR.

Paragraphs 3.3.17 - 3.3.19 - Local sites

Town and Parish Councils

- Paragraph 3.3.17 - 19 - Protection of sites depends on connectivity with non-designated areas of woodland, tree, hedgerow and pasture/field margin cover etc.

Natural England

- Paragraph 3.3.17 - note Sites of Nature Conservation Interest (SNCIs) are selected against published selection guidelines by the SNCI Selection Panel.
- Paragraph 3.3.19 - Further clarification is needed as to when harm to a local site would be acceptable, suggestion of amended wording.

Dorset Catchments Partnership

- Correction- SNCIs are recognised (not designated) by the SNCI Panel.

Environmental groups (non-statutory)

- Correct designation process.
- Apply hierarchical approach to impact on sites in paragraph 3.3.9.
- Insert 'wildlife' in title to avoid confusion, or paragraph 3.3.17 should also refer to Local Geological Sites (Regionally Important Geological Sites).
- Many sites of potential SNCI standard are unrecognised and often totally unknown – as they include only sites that have been surveyed.
- The wording regarding SNCIs needs to be corrected.
- Should add that survey and recognition of SNCIs is an ongoing process.
- Significance of priority habitats is overlooked.
- Priority habitats potentially include neutral and acid grasslands and this could have very significant implications for the Plan and its selection of sites.

Cranborne Chase AONB Team

- Issues with aerial nutrients from traffic impacting on Fontmell and Melbury Downs.

Developers/Landowners/Agents

- Paragraph 3.3.18 refers to the Environmental Bill, which is still not enacted. There needs to be a level of understanding of what is legally required.

Paragraphs 3.3.20 - 3.3.26 - Protected species

Natural England

- Paragraph 3.3.23 - Natural England is not the competent authority for planning applications – they are a statutory consultee of the appropriate assessment process.
- Paragraph 3.3.24 - paragraph should be expanded to include reference for all planning applications to conform to Natural England's "Protected species and development: advice for local planning authorities" statutory standing advice.
- Recommends the plan references the availability of Dorset Council's great crested newt district licensing scheme.

Environmental groups (non-statutory)

- Amend title to ‘protected and priority species’.
- Refer to Dorset Council great crested newt licensing scheme.
- The plan should help all nature not just the rare and threatened species. Proactive not reactive approach. Holistic rather than focusing on protecting one species at a time.
- Paragraph 3.3.20 – Recommend moving text concerning climate emergency to 3.3.1 as text is wider than just protected species.
- Consideration must be given to the impact of lighting on bats particularly their foraging routes.
- Development should avoid sites with high numbers of priority species. The council should select less sensitive sites.
- Should have a statement protecting priority species and habitats.

Paragraphs 3.3.27 - 3.3.32 - Ancient woodland Trees and hedges

Town and Parish Councils

- Paragraph 3.3.27 - No proposals in the Local Plan which will protect and enhance hedgerows as a network - of critical importance to the stated objectives of Dorset Council to maintain and enhance Biodiversity, Landscape Character, Heritage Assets, Green Infrastructure, and to mitigate Climate Change.
- Paragraph 3.3.31 - first sentence could be strengthened by adding at the end that ‘very special circumstances’ would need to be proven before such sites are allowed to be lost.
- The term ‘important hedgerow’ is a specific and narrow legal one and is not open to interpretation.

Natural England

- Recommends that the paragraphs in this section are reorganised so that the sections dealing with non-veteran trees (3.3.29) joins the section on hedges (3.3.32) placed after sections that deal with irreplaceable habitats.
- Paragraph 3.3.28 - paragraph should be expanded to include reference for all planning applications to conform to Natural England and the Forestry Commission’s, “Ancient woodland, ancient trees and veteran trees: protecting them from development” statutory standing advice.
- Paragraph 3.3.30. - Other than Ancient woodlands and veteran trees, recommends removing reference to other types of irreversible habitat, but instead commits to preparing a list of irreversible habitats that are present in Dorset as part of the development of the emerging Biodiversity SPD.

Cranborne Chase AONB Team

- Welcomes the discussion on ancient woodlands and veteran trees not least because of their contribution to the time depth of our landscapes.

Woodland Trust

- When considering protection of trees and hedgerows, it is essential to consider the extent of root area to ensure that adequate buffers are provided.
- For ancient and veteran trees, we recommend a minimum of 15 times the diameter or 5 metres beyond the crown, whichever is greater.
- The Dorset Biodiversity Appraisal Protocol, and details on requirements for buffers around ancient woodland and veteran trees and a clear tree replacement policy, should be reinforced in the plan.

Forestry Commission

- Paragraph 3.3.28 - It is necessary to include a note that not all small ancient woodland is recorded.
- Paragraph 3.3.30 - Sentence is confused and distracts from the protection afforded to woodland – in terms of relevant consultation bodies for ancient woodland, and other habitats.
- Current wording gives the impression that the “irreplaceable” status of some ancient woodland may need to be first agreed, this is not the case.
- It may be appropriate to produce a financially sustainable visitor management plan to mitigate recreational impacts on ancient woodlands.

Environmental groups (non-statutory)

- Change section title to ‘Irreplaceable and Priority Habitats’.
- Expand definition to include priority habitats following work to identify appropriate habitats in Dorset.
- Include reference to priority habitats listed in section 41 of Natural Environment and Rural Communities Act.
- Trees are important in the landscape and for biodiversity. Trees become a carbon sink once they’re 20 years old.
- Hedgerows are a priority habitat, providing high levels of biodiversity and habitat linkages.
- Removal of hedgerows will result in loss of species.
- Suggest 2m buffer during construction.
- EAD records of hedgerows are not wholly accurate.
- Should select sites that are not rich in trees or hedgerows.
- The Plan should make a distinction between types of trees and types of woodland.
- Should include a statement to make it clear that the beneficial role and consequent protection is not afforded to coniferous plantations.
- Paragraph 3.3.31 should also state housing or employment allocations would not be relevant to this NPPF policy.

Public response

- The importance of woodlands, new or existing, as multifunctional green space should be added to.
- No policies which explicitly protect rural character of Dorset or enhance tree and hedgerow cover of any area apart from development sites.

Other habitats and species

Town and Parish Councils

- No policies which address non-designated habitats or species – deserve protection.

Environmental groups (non-statutory)

- Lack of further information about otherwise undesignated priority and Biodiversity Action Plan habitats.
- Would like to see the allocation of land for woodland and wetland creation to offset housing development.
- Brownfield sites are often more biodiverse than 'greenfield' sites (esp for bees and other invertebrates) and shouldn't be dismissed as easy opportunities for development.

- Respondent notes that existing and potential ecological networks have been mapped but are dependent on existing and verified biodiversity records: in most cases the records are restricted to designated sites. (East Dorset Environmental Partnership).
- Respondent notes that the local plan makes no reference to biodiverse habitats, other than the heaths and those involving trees and woodland, and that:
 - there is no consideration of other key habitats the more relevant of which to the Local Plan are unimproved or semi-improved grassland – that may or may not have been recorded or considered, due to no public access to sites;
 - the loss of lowland meadows should be referenced as Priority Habitat that is irreplaceable as a key component of the ecological network (which also contributes toward mitigation of climate change through sequestration of carbon). (East Dorset Environmental Partnership).

Public response

- Create and expand new protected sites supported by a large scale rewilding integrated with accessible green infrastructure.

Recreational impacts on habitats sites

Town and Parish Councils

- Query whether a Coastal Recreational Disturbance Avoidance and Mitigation Strategy could be developed as an SPD - to obtain funds by means of a levy on developments in the affected area and which could be used to help protect some of the more at risk locations.

Cranborne Chase AONB Team

- Concerns over systems of payment for developments located specific distances from sites (such as heathlands), when no contributions to the management of AONBs is proposed – should be corrected.

National Trust

- Concerns with impacts of greater recreational use of the Fontmell and Melbury Downs arising from new housing development in Shaftesbury and the surrounding area – would encourage a mitigation strategy.

Environmental groups (non-statutory)

- Recreational pressure should be considered on all SACs in close proximity to significant developments.
- Without sufficient greenspace created or made accessible close to where people live, increasing access to nature sites will bring harmful impacts on sensitive sites and increased use of private cars to access sites further afield.
- Even with SANGS, the additional housing will undoubtedly lead to much greater pressure on key habitats and this should be recognised.
- It is essential that SANGS, other green space provision and mitigation projects are developed from the outset as an integral part of the plan not as an afterthought once housing allocations have been agreed.
- Concern about urban effects, not just recreation. Want a mention of air quality directly in relation to effect on heaths.

Developers/Landowners/Agents

- Need to work with BCP to ensure the Stour Valley Strategic SANG is delivered from Hengistbury Head to Sturminster Marshal as a key and critical element of the plan.

Additional sections

Natural England

- The plan needs to include a section highlighting the need to protect priority habitats (as listed under Section 41 of the Natural Environment and Rural Communities Act).

Environmental groups (non-statutory)

- Need for an additional paragraph and policy regarding acid grasslands and neutral grasslands, as they too are potentially priority habitat and potentially irreplaceable.

Mapping

Public response

- All designated biodiversity/nature recovery/ecological networks sites should be illustrated on all the inset proposal maps.

4.2. Policy

Policy approach

Natural England

- Strongly supports policy ENV2, subject to amendments.

Historic England

- On-site and off-site habitat enhancement, mitigation and/or compensation may affect the historic environment.

Sport England

- Would encourage pre-applications for developments involving sport to look at and understand the needs of complying with ENV2 and the needs of the sport – involve Sport England in discussions.

Environment Agency

- How the approach will translate at ground level/in real terms will be important. We would ask how compensatory habitat is to be identified and what would be the criteria.

Bournemouth, Christchurch, and Poole Council

- As we progress our respective plans it will be imperative that our cross-boundary approaches to mitigating impacts on designated habitats are continued and developed further.

RSPB

- Welcome and support the approach to protecting rare and threatened habitats and species, recognising role of local sites, mention of SPDs related to national site networks, and the interim strategy on Chesil and the Fleet.
- Support the commitment to mitigation strategies for other NSN sites in the New Forest and the Solent but need detail before next version of the plan.

Town and Parish Councils

- Financial compensation due to the loss of environmentally significant land does not seem appropriate as it appears to undo the good intentions of this plan.
- The town council 'looks to' the Local Plan to better protect species and our most important habitats with no reduction in the current level of protection, and active support for nature's recovery from freefall decline by identifying new Highly Protected Areas and Nature Recovery Areas and strategically planning 'nature recovery areas'. (Bridport Town Council).

Developers/Landowners/Agents

- Suggestion that the policy is split in to ensure that the impact on species, habitat and flora and fauna are considered and given equal weight.
- Suggest that trees, their preservation and sensible replanting not be a separate policy that also recognises climate change and the fact that some trees and shrubs will now be better suited to the climate as we go forward.
- Policy wording is generic - does not support, allocate or provide guidance to deliver any specific, strategic habitat protection or management projects in order to fulfil the requirements of the Habitats Regulations.

Public response

- Developers should not be allowed to mitigate any loss of habitat by paying compensation as this very rarely results in equivalent habitat being replaced.
- Dorset is rich in diversity - should be maintained to enable spread to neighbouring areas.

Criterion I.

Natural England

- European sites are now referred to as Habitats sites.
- Should include reference to other sites which are afforded the same protection as Habitats sites – potential SPAs, possible SACs, listed or proposed Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats sites.
- Clause I To justify an exceptional circumstance all three tests must be met, suggest adding the word 'and' to the first bullet.

Forestry England

- Need to protect European protected sites and species.

RSPB

- Update criteria I, first bullet- all 3 tests should be considered and met in sequence, therefore insert '**and**' at end of bullet point to remove ambiguity.

Criterion II.

Natural England

- References to nutrients should refer to nitrogen rather than nitrates and phosphorus rather than phosphates.
- An additional bullet should be added stating that additional mitigation schemes may be required to avoid any new adverse impacts to Habitats sites identified during the local plan period.

Dorset Wildlife Trust

- II. Where specific impacts have been identified in relation to particular sites, mitigation measures for these sites will include **the following. other impacts are being assessed and may be adopted as policy during the course of the plan:**

Inspired Villages

- Policy ENV2 fails to refer to the recently released ‘Dorset Heathlands Interim Air Quality Strategy’ (December 2020). For example, add to criterion II.

Environmental groups (non-statutory)

- Not clear what “sustainable management” is. Habitat management should not be funded by developer contributions and it is strategic access management measures (SAMM) that contributions should be going towards. The mitigation approach to date has involved both SAMM and HIPS (which include SANG), not either/or.

Local community groups (non-statutory)

- Caution is needed to ensure that the provision of suitable alternative greenspace (SANG) does not lead to extra car journeys.
- Concerns with impact of SANGs on landscape, views, and biodiversity.

Developers/Landowners/Agents

- Approach is not consistent with the approach set out in the 2 relevant adopted SPDs – need for clarification of the approach for Poole Harbour SPA mitigation.
- Criteria II. Emerging Policy ENV2 fails to make reference to the recently released ‘Dorset Heathlands Interim Air Quality Strategy’.
- Some of the wording needs to be refined to make it clearer what the requirements are.

Criterion III.

Natural England

- Clause III needs to be amended to include an important additional caveat that only exception is where the benefits of the development in the location proposed clearly outweigh impacts on SSSIs – see suggested wording.
- second bullet should be amended to be more specific in regard to compensation requirements – see suggested wording.

Environmental groups (non-statutory)

- Suggested changes to strengthen the policy around national sites.

RSPB

- Strengthen the policy around national sites - ‘where adverse impacts cannot be fully mitigated compensation **measures will be required to offset the residual impacts on the affected special features of the national site.**’.
- Add footnote to reflect list of sites in NPPF 176 to clarify extent of protected sites.

Developers/Landowners/Agents

- Concern that the criterion is not positively prepared as currently drafted - impact on national sites will vary for different development scales and types.

- While it is noted that all allocations within the plan are considered to be strategic, they will yield in some cases a small number of units, and it may be the case that they are unable to provide the enhancements as set out.

Criterion IV.

Natural England

- Policy set out for local sites should include the protection of all priority habitats (as listed under Section 41 of the Natural Environment and Rural Communities Act).
- Recommends rewording of the criterion – see suggested wording.

Environmental groups (non-statutory)

- Local wildlife sites (SNCIs, LNRs) ... Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat/**features of at least equivalent value** in a suitable alternative location to ensure there is no net loss of biodiversity **or function of the site**, as set out in Policy ENV23.
- Suggest the word 'preferred' is not clear enough and should be replaced with 'required'
- Suggest that local sites will be safeguarded from development through the use of the mitigation hierarchy with avoidance as the required approach.

RSPB

- Criterion IV should be consistent with other parts of ENV2 whilst remaining proportionate in level of protection afforded local sites.

Developers/Landowners/Agents

- The approach is not consistent with the Planning Practice Guidance [PPG] or the guidance published by Natural England in relation to construction near protected areas and wildlife - no requirement to demonstrate reasons of overriding public interest.

Criterion V.

Environmental groups (non-statutory)

- Protected and priority species. New criteria 'Harm to priority species and species of local concern must be avoided, or otherwise mitigated and if necessary provide compensation, as well as providing net gain as stipulated in Policy ENV3.'

Criterion VII.

Natural England

- Recommend that "(and other irreplaceable habitats)" is added to the title of the Ancient woodland, ancient and veteran trees, and hedges section of the policy.
- Recommends the wording is strengthened to better reflect the importance and value of mature trees in urban settings – see suggested wording.

Environmental groups (non-statutory)

- Irreplaceable and priority habitats. Insert 'Development resulting in the loss or deterioration of ancient woodland, ancient or veteran trees (and other irreplaceable habitats) will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'.
- ENV2 criterion VII misquotes NPPF 175c. Should emphasise plantations on ancient woodland sites have the same protection.

Developers/Landowners/Agents

- Consider commercial woodland in a different manner due to the monoculture that can be created and also consider where felling licenses have been issued.

Criterion VIII.

Town and Parish Councils

- Criteria VIII should be strengthened by including a statement that only trees of the same native species should be used as replacement stock.

Cranborne Chase AONB Team

- Criterion VIII, resisting the replacement of large mature trees with shorter lived species, misses some useful policy points about the provision of native species and the hierarchy of locally, regionally, and nationally sourced trees for planting schemes.

Criterion IX.

Public response

- Protecting existing hedgerows from development and planting trees should be a requirement, not just an expectation (ENV2). Our record on protecting hedgerows is not good, replacement hedging is not a reasonable compromise.

Final paragraph

Natural England

- Note the ENV2 concluding paragraph is repeated as ENV3 clause VI and suggests the wording is better placed in the ENV3 policy.
- Recommend that the phrase “and deliver a net gain for such objectives” is deleted as it does not add to the requirement and may be confused with more general net gain requirements.
- For complex or significant cases Natural England recommends the local plan signposts developers to its discretionary advice service.

Historic England

- Suggested changes to the wording of the paragraph to include references to policies ENV4 and ENV5.

Environmental groups (non-statutory)

- Suggest changes to the wording to require all proposals to conserve/enhance biodiversity and deliver a biodiversity net gain, and that buffer zones will be required around sensitive areas

Inspired Villages

- The ability of a site to deliver significant and positive biodiversity enhancements alongside other uses should be considered within emerging Policy ENV2. Insert ‘or dual’ purpose.

Additional criteria

Natural England

- Additional policy clause is required to cover priority species (as listed under Section 41 of the Natural Environment and Rural Communities Act) and species of local importance.
- New clause should ensure all developments have followed the mitigation hierarchy in relation to these key wildlife interests and that appropriate enhancements are secured.

Dorset Catchments Partnership

- We would support the importance of river and floodplain habitats being recognised so that they receive the same protection as woodland and hedges - they too provide strategically valuable wildlife corridors, support a range of protected species, and provide opportunity for restoring wet habitats.
- This policy should specifically include reference to policies for priority BAP sites, including (Chalk) rivers as per local sites (SNCIs and LNRs) since these will inform the Local Nature Recovery Strategy that is in development.

Environmental groups (non-statutory)

- Suggested additional criteria that priority habitats will be safeguarded from development. If this is not possible then mitigation must be provided, or as a last resort compensation to include funding for management for at least 30 years.
- Lack of a policy to require the protection of wider ecological networks and their existing biodiversity.
- Add that Ecological networks will be fully identified and protected.
- A requirement for all survey data to be submitted to DERC should be included.

Developers/Landowners/Agents

- Need to enshrine the provision of Strategic SANG into the policy to ensure it is delivered.

5. Policy ENV3: Biodiversity and Net Gain

5.1. Approach

Introduction/general comments

Natural England

- Supports policy as an important tool tackling the climate change and ecological emergency declared by the council.

Town and Parish Councils

- The scope of the proposed policies is to be commended.

Developers/Landowners/Agents

- Support the principle of biodiversity.

Groups and organisations

- Welcome the policy.
- Include links to policy documents referenced in chapter.

Dorset Wildlife Trust

- Generally support with amendments.

Forestry England

- Forestry England keen to work in partnership to deliver net gain and contribute to the nature recovery network.

Dorset Climate Action Network

- Wish to see vigorous use of the statutory measures for environmental protection, and full use of requirements for significant development projects should be accompanied by Biodiversity Plans and Landscape and Visual Impact Assessments.

Public response

- Support for ecological net gains.
- Strong policies and processes needed to ensure that biodiversity net gain funding is retained within the unitary authority area, rather than spent nationally.
- Concerned that EIA guidelines are under review – may undermine policy if guideline relaxed.
- Should be under appropriate circumstances, include flexibility by adding ‘where possible’ in policy.
- Need to provide a policy mechanism to facilitate financial contribution towards a strategic delivery scheme.
- Does Dorset Council have sufficient resources to give the policy effect.

Paragraphs 3.4.1 - 3.4.2

Inspired Villages

- Paragraph 3.4.2 should include reference to on-site compensation measures and to using legal agreements to secure mitigation and/or compensation.

Town and Parish Councils

- Paragraph 3.4.2 - ‘like for like’ - could stand in the way of habitat proposals to create or enhance a relatively uncommon habitat when a much more common one is being impacted upon by development.
- Paragraph 3.4.2 - The presumption should be for Avoidance of Harm; Compensation should be a last resort, in that it is unlikely that a valued and established habitat can be realistically replaced elsewhere without a net loss.

Paragraphs 3.4.3 - 3.4.5 - The Dorset Biodiversity Appraisal Protocol

Dorset Wildlife Trust

- Paragraph 3.4.3 Dorset Biodiversity protocol should become a Supplementary Planning Document.
- Paragraph 3.4.5 Strongly supports the requirement to involve Dorset Environmental Records Centre, through data searches and submission of records which will then inform future decisions.

Local environmental groups (non-statutory)

- Mitigation measures could prove ineffective. An independent EIA should be produced for each development site.

Groups and organisations

- Recommend including a requirement for baseline surveys to be carried out at beginning of planning pathway, e.g. in summer 2021 to establish what biodiversity interest there is on the various Option sites, not wait until planning application stage. Include DERC data but not rely on it solely.

- Support the Dorset Biodiversity Appraisal Protocol and recommend it becomes a Supplementary Planning Document.

Paragraphs 3.4.6 - 3.4.7 - The Environment Bill

Home Builders Federation

- Council should still to levels and targets set in Environment Bill as an appropriate balance between deliverability of development and reversing environmental decline – delete ‘minimum’ from clause II of policy.

Public response

- Need to see the Environment Bill and Building Regulations before adopting the plan.

Paragraphs 3.4.8 - 3.4.12 - Net gain

Dorset Wildlife Trust

- Paragraph 3.4.8 should refer to thresholds that determine the size or type of development this requirement refers to. This could be set out within the DBAP – insert into paragraph.
- Add ‘Where compensatory habitat or species conservation is required, this should be directly linked to ensuring no net loss of the habitats or species affected.’ to para 3.4.9.
- Clarify that net gain is in addition to anything required in policy ENV2.
- The council’s Natural Environment Team should review metric and assessments submitted by Development industry- add to text.

Groups and organisation

- Paragraph 3.4.9 – recommend this paragraph stresses that there is not a like-for-like replacement for any habitats and species lost. Assuming typo in original document.
- Paragraph 3.4.10 - recommend that it is clearer that net gain is additional to no net loss and requirement for a wildlife-friendly built environment.
- Paragraph 3.4.10 - could include reference to pond creation.
- Broadly support proposed developments being required to deliver a minimum of 10% net gain in biodiversity. Emerging data from existing schemes indicates that 10% can be delivered on-site by most developers, yet a higher threshold would be needed to create genuinely new ‘off site’ habitats which contribute to Nature Recovery Networks, etc. A higher figure such as 20% would enable this to happen.
- Recommend that it is clearly stated that biodiversity net gain is not a way to avoid mitigation for impacts to European sites or to allow development that impacts designated sites.
- Expect the Council to honour the commitment to “ensure that all new development incorporates ecological net gain to help deliver the aspiration to reverse the current decline in protected species and habitats”.
- The council should also look to pioneer the requirements for Net Biodiversity and Carbon Gain from all developments within the Local Plan.

Environment Agency

- Support the proposal to achieve Biodiversity Net Gain.
- Consider community beehives.
- Threshold for gain should be more ambitious than 10%, to help address climate and ecological emergency. The Agency’s flood risk management schemes will need to achieve 20%.

Home Builders Federation

- Note the transitional arrangements towards achieving 10% net gains in biodiversity and the significant costs in delivering net gains in biodiversity.

Sport England

- Supports the ideals of this policy but feels the 10% target, if implemented, will impede the growth of sport and in turn negatively impact on the health targets of this Plan.
- It is unreasonable to expect playing fields or new sports developments to give over 10% of the land to secure biodiversity net-gain. Funding for sport tends to come from the public purse and it is limited.

Woodland Trust

- Require at least 20% net gain in part to avoid loopholes that can result in biodiversity loss.

RSPB

- Part of biodiversity net gain should be delivered through strategic enhancements.

Dorset County Hospital, NHS Trust

- The approach taken to achieving biodiversity net gain in Dorset needs to be aligned with the DEFRA national approach and calculation process.

Town and Parish Councils

- Net gain should be measurable, permanent, and maintained.
- Net gain in biodiversity has the potential to be transformative for Dorset nature.
- Clarify how net gain be assessed, implemented and monitored.

Developers/Landowners/Agents

- There should be a degree of flexibility in relation to biodiversity net gain and should only be sought where possible. It is difficult to see how a greenfield allocation would be able to achieve 10% net gain.
- Without legislative requirement for Biodiversity Net Gain it would be inappropriate for the target to be set in the plan and should be more flexibly worded.
- Fails to directly reflect the net gain contribution made through the creation of new habitat as part of a new development – suggests amended wording to reflect this.
- It should be made clear that open space and mitigation land (for example SANG or nutrient off-set land) can contribute towards biodiversity net gain.
- Recognise the importance of protecting and enhancing biodiversity and acknowledges that the proposed requirement for 10% net gain reflects the expected content of what will become the Environment Act.
- Will need to reflect what is in the final Bill.

Local environmental groups (non-statutory)

- Demonstrating net gain will be very difficult.
- Net gain can work in an area of limited existing biodiversity, not support re-creation of priority and local habitats, e.g. species-rich hedges.

Public response

- "Net gain" cannot compensate for the destruction of biodiverse sites. Wildlife ecosystems cannot be re-created elsewhere, so the default approach must be to protect existing sites and prevent damage.
- Onsite where possible and then locally.
- Welcome a strategic approach where biodiversity net gain funds are pooled to deliver strategic objectives for nature recovery at the landscape scale.
- The provision of bat, bird and bee boxes is no substitute for the habitat nature provides.
- Do not accept the concept of biodiversity net gain. Different eco-systems are simply not comparable through a single metric. The metric undervalues the value of ecosystems that take hundreds of years to create.
- Compensation offered by the biodiversity net gain principle is not enough.
- The removal of topsoil does not meet the Council's assumptions of net gain.
- There is a case for Dorset creating its own more sensitive methodology we can use when the current crude system of ecological net gain is abandoned.
- Unrealistic to expect 10% net gain in biodiversity within a development area.
- Must accept the reality that new development in a rural site will reduce biodiversity in that area unless it includes a large enough area that could be described as a nature reserve.
- Enforcement action if net-gain is not achieved with robust penalties.

Paragraph 3.4.13 - Nature Recovery Network and Ecological Networks

Woodland Trust

- Highlight Natural England's Standing Advice which clearly states that any compensation must NOT be considered in determining any wholly exceptional public benefit.
- As irreplaceable habitat that by definition cannot be compensated for, the Woodland Trust urges that these sites are protected in line with the NPPF and outside the remit for biodiversity net gain.

Dorset Wildlife Trust

- Emphasize expectation of like for like compensation habitat expected.

Environment Agency

- A connected network for wildlife needs to be created across Dorset (and into surrounding areas) to prevent pockets of isolated biodiversity improvement. This can be integrated with recreation, non-motorised transport, wellbeing, flood risk management and Water Sensitive Urban Design so that the network has multiple functions and benefits.

Local environmental groups (non-statutory)

- Nature recovery schemes are appropriate in areas that need to recover, not to deliver habitat compensation.
- The Plan should give clear indication, in maps, of the territories where Nature Recovery Zones are planned, and wildlife corridors, river catchment management schemes and other measures are intended to protect, extend and strengthen Dorset's network of high-nature-value sites.
- The spatial allocation for Nature Recovery land-use should be determined at the same time as land-use for housing and workspace.

Town and Parish Councils

- Should map areas where council and its partner agencies intend to create extended nature recovery zones, wildlife corridors, river catchment management schemes and other measures to protect, extend and strengthen Dorset’s network of high value sites.

Groups and organisations

- Paragraph 3.4.13 – Add ‘Dorset’ to Local Nature Partnership. Support the text in this paragraph, but it does not transfer to the policy and this should be addressed.
- Support in principle, with the addition of the link to para 3.4.13 and Ecological Network Maps.
- Safeguard Nature Recovery Networks, Ecological Networks, potential heathland support areas and buffer zones to create maximum value from current and future restoration and additional connective work and provide additional resilience to climate change.
- Development should not be permitted on a site that provides part of a local Nature Recovery Network.
- Potential heathland support areas (HSAs) should be included as part of the Nature Recovery Network and should be included as part of the suite of heathland mitigation measures.

Public response

- Irreplaceable habitats must be protected in line with NPPF para 175c and cannot be compensated for.
- Sites for Nature Recovery are massively important.
- Should allocate sites for nature recovery building on existing and new ecological networks.
- Focus on already protected sites will result in fragmentation.

Paragraph 3.4.14 - Local Nature Recovery Strategy

Dorset Wildlife Trust

- Agree with paragraph 3.4.14.

Public response

- Need to highlight the forthcoming requirement for Local Nature Recovery Strategies.

Mapping

Public response

- Ecological Networks and sites designated for their biodiversity or Nature Recovery should be shown on all the proposals maps.

5.2. Policy

Policy approach

Historic England

- ENV3 should cross-refer to ENV4 and 5 - biodiversity enhancement, mitigation and/or compensation may affect the historic environment. Heritage impact assessments may be required.

Town and Parish Councils

- Should replace the use of ‘should’ with ‘must’ in the policy.

- In the absence of mitigation measures a clear measure of ‘harm’ and compensation should be included.
- Defeatist policy as the ‘mitigation hierarchy’ fails to protect biodiversity, which relates to the whole natural world, not just protected species.
- In particular we raise concern that species that act as pollinators are included in this policy.

Criterion I.

Natural England

- Recommend following addition to clause I. - “Biodiversity net gain calculations are not a material consideration when considering the acceptability of proposals that may adversely affect wildlife interests covered by policy ENV2”.

Inspired villages

- Query why wording in relation to impacts on National Sites is repeated from ENV2 - it is recommended that this first paragraph is removed from emerging Policy ENV3.

Woodland Trust

- ENV3(i) should be strengthened to reinforce the mitigation hierarchy.

Public response

- Hierarchy - Harm must be avoided at all costs before mitigation or compensation is implemented.
- If a protected species is present on a site how can this be mitigated? Can the policy include examples of what mitigation is acceptable for different species and how it can be achieved.
- Compensation option is a way to get out of requirement.
- Emphasise Natural England’s Standing Advice with regards to irreplaceable habitat that any compensation must NOT be considered in determining any wholly exceptional public benefit.

Criterion II.

Developers/Landowners/Agents

- Replace ‘part of the existing and proposed Ecological Network’ with part of the existing Ecological Network and creation of new habitats as part of the proposed Ecological Network.”
- Criterion ii should state that applicants should ‘seek to achieve a 10% net gain in biodiversity’ as opposed to this being a mandatory requirement.
- Policy will need to aligned with national legislation, policy and guidance.
- Suggest introduce transitional arrangements into Criterion ii, particularly for live applications.
- Must be under appropriate circumstances, e.g. use opportunities to change land management from a manicured golf course to managing for nature and biodiversity.

Criterion III.

Dorset Wildlife Trust

- Criteria III - clarify that these enhancements are in addition to net gain.

Town and Parish Councils

- Criteria III - concerns that monetary compensation could be used by developers to avoid mitigation.

Criterion IV.

Town and Parish Councils

- Criteria IV - concern with additional cost of long term monitoring and management of biodiversity features, increasing the cost of housing, resulting in higher prices.

Public response

- Clause IV should include a 30 year provision for monitoring and management rather than just "long term".

Criterion VI.

Natural England

- Clause VI is repeat of concluding paragraph of ENV2 – better placed in ENV3. Recommend removal of text in ENV2 to avoid confusion between ENV2 and ENV3 requirements.

Groups and organisations

- Clause VI is repeat of concluding paragraph of ENV2.

Additional criteria

Groups and organisations

- Insert new criteria - "Dorset's Nature Recovery Network and Ecological Networks will be safeguarded from development. Buffer zones will be required to protect sensitive habitats."

5.3. Other issues

Net gain assessments and metric

Developers/Landowners/Agents

- Need to adopt a specific method for the assessment and quantification BNG increase to allow for consistency of approach between planning applications.

Public response

- The scientific basis of the predicted enhancement of biodiversity needs to be explicit with evidence of the effectiveness.
- Does the policy allow for independent assessment of the impact of a development on biodiversity and proposed mitigation.

Biodiversity

Town and Parish Councils

- Biodiversity improvement should be mandatory.
- Biodiverse areas in the council should be preserved (this is a particularly important issue in the western Dorset functional area which includes landscape designated as AONB and heritage coast).
- Concern with countryside development and impact on wildlife and biodiversity.
- Importance of local stewardship in protecting biodiversity in and around settlements.
- Scant attention is paid to the impact of development in dark, quiet back land areas of the settlement such as flood plains and woodland where wildlife is active and roam freely.

Viability of development

Developers/Landowners/Agents

- Will need to include the requirement for biodiversity net gain in the viability study for the local plan.
- There appears to be insufficient consideration of impact of this new policy on sites which are the subject of live planning applications and where land budgets have been fixed.

Biodiversity SPD

Developers/Landowners/Agents

- Content of the forthcoming Biodiversity SPD will be critical.

6. Policy ENV4: Landscape

6.1. Approach

Paragraphs 3.5.1 - 3.5.2 - Introduction and approach

Dorset AONB Team

- The title of this policy could helpfully be amended to read ‘conserving and enhancing landscapes and seascapes’.
- It is recommended that further depth be added to enrich the supporting text (see full comment for suggestions).

Cranborne Chase AONB Team

- Recommends that the section title for 3.5 is amended to ‘Conserving and Enhancing Landscapes’.
- Concerned by the apparent lack of attention to the significance and status of AONB and landscape matters within the consultation document in relation to other topics.
- Commitments entered into in the European Landscape Convention are not mentioned.
- The significance of NPPF policy on landscapes should be explained in the plan.

Environmental groups (non-statutory)

- Paragraph - 3.5.1 - Amend to read “...and enhancing the natural environment.” Amend to read “... may be popular with local people, particularly where they have important historic or cultural significance.”.
- Paragraph 3.5.2 – need to recognise that upstream changes to a catchment to enable development will also affect the landscape though can be more creative and beneficial - emerging revision to NPPF places great emphasis on “beauty”.
- Importance of the natural and farmed environment for peoples’ health and wellbeing.

Public response

- Paragraph 3.5.2 - objection - An application for an extension should not lead to the Council re-assessing the harm of an existing development that has previously been found acceptable and might have been in place for years.
- Section 3.5.2 is good and should be encapsulated into a definite policy statement here.

Paragraphs 3.5.4 - 3.5.7 - Information requirements

Puncknowle and Swyre Parish Council

- Concern that undesignated areas are not considered worthy of a landscape assessment for development.

Dorset Catchment Partnerships

- Paragraph 3.5.6 - Information provided by applicants should be at appropriate times of year to best identify issues or important features for protection.

Cranborne Chase AONB Team

- Paragraph 3.5.4 should be amended to read 'developers must demonstrate'.
- Undertaking an LVIA will not guarantee that a project is likely to be sympathetically received or gain approval in a designated landscape.
- Sentiments in paragraph 3.6.22 in relation to statements of heritage significance should also be echoed in relation to LVIA's in the landscape section.

Environmental groups (non-statutory)

- Bearing in mind the definition of "must" and "should" (p3), suggest the wording of this para. is changed to "...all applicants must provide: ...".
- Paragraph 3.5.6 - Amend to 'all applicants must provide'.
- Wish to see vigorous use of the statutory measures for environmental protection, and full use of requirements for significant development projects should be accompanied by Biodiversity Plans and Landscape and Visual Impact Assessments.

Public response

- LVIA seems sensible, linking LVIA with Area of Outstanding Natural Beauty Management Plan/neighbourhood plans is welcome and sensible.
- Landscape assessments must take account of existing DPD (including land defined as important gaps and of local interest).
- Paragraph 3.5.5 and 3.5.6 - requirement for LVIA on all major development is unreasonable as not all major developments will warrant a full LVIA - should be on a case by case basis.
- Paragraph 3.5.7 of the Local Plan states that these assessments should be used to guide the principles of the design and mitigation measures - does not state that development in these areas should be limited or the land be protected - a degree of inconsistency with how the supporting paragraphs interact with one another.
- LVIA's are not independent, Dorset AONB team are not independent.
- Landscape character assessments should be specifically mentioned.

Paragraphs 3.5.9 - 3.5.11 - Designated landscapes - Areas of Outstanding Natural Beauty

Natural England

- Paragraph 3.5.9. - note the Cranborne Chase and West Wiltshire Downs AONB is now typically referred to as the Cranborne Chase AONB.
- AONB section should be expanded to require major development considered to meet the exceptional circumstance tests - provide a suitable compensation strategy to fully moderate any residual adverse landscape and visual impacts through the delivery of environmental measures that further the objectives of the AONB management plan.

- Supporting text should emphasise the importance of the conservation and enhancement of wildlife and cultural heritage within the AONBs (In line with NPPF paragraph 172).

Historic England

- The text should state that the conservation and enhancement of cultural heritage is an important consideration in AONBs.

Cranborne Chase AONB Team

- Little attention appears to be given to the ways in which the Plan will enable the Council to honour its duty under Section 85 of the Countryside and Rights of Way Act 2000 in respect of each and every proposal that effects land in an AONB.
- No recognition of the fact that AONBs are the only national designation where local authorities are statutorily required to produce and adopt a management plan.
- No mention of the International Dark Sky Reserve status of this AONB.
- The purposes of AONB designation, namely conserving and enhancing natural beauty, should be set out together with the Government's holistic view of what natural beauty comprises.
- More emphasis and information needed regarding AONB management plans, and the process of their adoption.
- Need to reference section 84 of the CROW Act, and guidance from DEFRA (2011) in terms of accomplishment of the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.
- Need to emphasise that the purpose of AONB designation is not just conserving but also enhancing - both actions have to be achieved.
- The second sentence in paragraph 3.5.9 mixes up the statutory purposes of AONB designation and the Council's duty under Section 85 of the CROW Act – need to reword this.
- Paragraph 3.5.13 - 'other valued landscapes' - it has been necessary to demonstrate that such landscapes not only have the attributes identified but that the community has gone through some process which demonstrates that they are valued by the community.

Dorset AONB Team

- Countryside and Rights of Way Act 2000 indicates that the AONB Management Plan policies are the authority's policies for the management of the AONBs, a point that should be highlighted within this section of the Plan.

Town and Parish Councils

- Greater protection of the AONB is required.
- Disagreement with development in AONBs.
- More explicit reference should be given to the AONB and its implications for managing and conserving the landscape.
- Considers that the AONB has a role in maintaining modern work life balance for those living/working in the area.
- Land use does not respect Areas of Outstanding Natural Beauty and Green Belt.
- Considers that all major development in the AONB should be refused.
- Expand the boundaries of the AONB to include Waterston Ridge and surroundings.
- The preamble references "scenic beauty" in the AONBs where in fact this is distinct from 'Natural Beauty'.
- Communities within the AONB are places to live, work, and visit - these communities will need some development (with care) in order to evolve and remain relevant over the life of this plan.

- Need to consider sustainable development and how it fits into AONB communities.
- Consider that there should be a review of the Dorset AONB to determine whether the designations are still appropriate, given more recent environmental designations.
- Development should be allowed where strategic policies cannot otherwise be delivered and that compensatory activities should be considered.
- The plan should incorporate the qualities that led to AONB designation.
- Paragraph 3.5.10 - Replace “not conflict with” with “safeguard and enhance”.

Wool Flora and Fauna

- Emphasis on AONB should not be to detriment of beauty outside designated areas.

Local community groups (non-statutory)

- Significant role of AONB in changes to peoples' work/life balance post Covid.
- The landscape of Dorset is not considered properly within the Plan – concern with large Area of Outstanding Natural Beauty in Dorset, does not appear to be subject to clear forward thinking.

Developers/Landowners/Agents

- Need to recognise that what constitutes major development in the AONB should reflect site and scheme specific proposals and not just the definition of major development as set out in the DMPO.
- Countryside and AONB should not be treated as a 'museum' which should be retained in situ, but rather it should be recognised as a place of commerce, economic activity, and employment.
- There will be circumstances that development in the AONB will be required to ensure housing meets local needs and to ensure the continued vitality of the settlement in order to avoid the outmigration of younger people looking to access the housing market.

Public response

- Irrespective of the housing land supply position, development should not be permitted on land designated as AONB, land defined as locally important landscape or land defined for its amenity value.
- Council should not support housing development in the AONB to meet the housing needs of neighbouring areas.
- All of Dorset should be defined as Area of Outstanding Natural Beauty.
- Respondent considers that the local plan policies/strategy fails to recognise the large, protected areas and limited opportunity for development, and suggests that a buffer is formed around protected areas like World Heritage Sites and AONB.
- Lack of details of how the Local Plan will protect and enhance the biodiversity of the AONBs.
- Consider that Area of Outstanding Natural Beauty designation safeguards inappropriate practices.
- Query whether reference to scenic beauty for Areas of Outstanding Natural Beauty is accurate (this is distinct from natural beauty).
- Development may be needed to sustain communities within the Areas of Outstanding Natural Beauty.
- Paragraph 3.5.11 - paragraph is onerous and inconsistent with the PPG - land within the setting of these areas often makes an important contribution to their natural beauty and poorly located or designed development can do significant harm - Not all settings have this role.
- Paragraph 3.5.11 should be amended in line with the PPG and draft supporting paragraph 3.5.7.
- Concerns over lack of 5 year housing land supply, apparent need to build on AONB.

- Statement needs to be more honest and accept that development will harm the AONB and then give the reasons as to why it will be allowed.
- Being an AONB brings little benefit to the economically active residents of the town.
- Road schemes, traffic management, street lighting, street furniture, signage and development & building plans do not seem to take any account of the AONB.
- Do not consider that current management of designated landscapes in intensive agriculture is appropriate.
- Concern with lack of credible support and no strategic policies for the protection of AONB.
- Concern with the approach that seemingly allows development on the AONB as long as there is green infrastructure, wildlife sites, and wildlife corridors.

Paragraph 3.5.12 - Designated landscapes - Heritage Coasts

Historic England

- The text should explain the purpose of Heritage Coasts.

Developers/Landowners/Agents

- National planning policy does not restrict development in heritage coast but encourages proposals to be judged on their merits.
- Need to reflect the definition in the NPPF of heritage coast.
- Should exclude on mapping of the heritage coast areas which have developed land to encourage redevelopment of brownfield land.
- The Council should define the term ‘special character’ in the context of Heritage Coasts to assist with the application of ENV4.

Paragraphs 3.5.13 - 3.5.14 - Other ‘Valued Landscapes’

East Dorset Environment Partnership

- Paragraph 3.5.13 - Other valued landscapes – areas have previously been identified as Areas of Great Landscape Value (AGLVs) identified by the Councils’ landscape officers with specialist knowledge.
- Paragraph 3.5.13 - Amend to read – “The identified physical qualities of a landscape should be established using a combination of historic data, evidence from the AGLV SPDs and the most recent landscape character assessments.”
- Appears to be a retrograde step to require them to be identified in Neighbourhood Plans (where they exist) or to rely only on inevitably biased assessment by a developer’s consultant.
- There is potential for important historic landscapes to be restored - no guidance in the Plan on how they will be addressed where no Neighbourhood Plan is proposed - reference to the most recent landscape character assessment should be amended to cover this.

Local community groups (non-statutory)

- Failure to consider character and beauty the countryside around the urban fringe – such as The Waterloo Valley and Leigh Basins.
- Important Open Gaps and Land of Local Landscape Importance should be retained.
- Concern that non-designated landscapes are undervalued in the plan.

Developers/Landowners/Agents

- Should identify ‘valued landscapes’ in order to create a more streamlined approach.

Town and Parish Councils

- Considers that the term 'valued' landscape needs to be better defined in the local plan.
- Communities who have not prepared their own neighbourhood plan should have a role in defining 'valued' landscapes.
- Considers that 'community value' should be added to those attributes that area used to define landscape value.
- Expand a number of local landscape designations.

Public response

- Irrespective of the housing land supply position, development should not be permitted land defined as locally important landscape or land defined for its amenity value.
- Note that the local plan does not take forward 'Important Open Gaps' and 'Land of Local Landscape Importance' identified in existing DPD.
- Consider that locally important landscapes should be defined in the local plan.
- Landscapes with local value should be defined on a map.

Impact, mitigation, and enhancement

Town and Parish Councils

- Loss of environmentally significant land cannot be offset by financial compensations.
- Concern that landscaping within developments/SANGS etc is not generally followed up with a maintenance program – need for monitoring and maintenance in perpetuity.
- Scant attention is paid to the impact of development in dark, quiet back land areas of the settlement such as flood plains and woodland where wildlife is active and roam freely.

Natural England

- Recommends that specific reference is made to the requirement for all development to meet the objectives of the Cranborne Chase International Dark Sky Reserve designated by the International Union for the Conservation of Nature (IUCN) Protected Areas.

Historic England

- It should be recognised that historic landscapes and seascapes can be or form the setting for heritage assets, which should be taken into account when applying ENV4, or there should be a cross-reference to ENV5.

Cranborne Chase AONB Team

- Obligation on LPAs to control bad lighting and reduce, year on year, light pollution AONB's status as an International Dark Sky Reserve.
- Developments within the AONB and its setting should make compensation payments to help conserve and enhance this AONB.
- Heritage section has some useful indications on positive approaches to assets and a similar approach should be adopted for conserving and enhancing landscapes.

New Forest National Park Authority

- The wording protecting the setting of National Parks included in the NPPF (January 2021) is relevant to the preparation of the Local Plan.

West Dorset CPRE

- Lack of plan to protect the beautiful countryside, rather the opposite.

- Reference to December 2020 government statement - meeting housing need is never a reason to cause unacceptable harm to Green Belt and protected landscapes.

Local community groups (non-statutory)

- Developers should be made to ensure that established hedging and trees are retained for new developments to blend into the landscape.

Developers/Landowners/Agents

- Needs to be stronger requirement for potential impacts / harm to be balanced against potential benefits.
- Landscaping as a concept should not be seen as a catch all and this is not clear from the policy as proposed.

Public response

- Enhancements to the AONB could include potential for increased revenues from tourism and environmental management.
- Landscape can only be conserved with comprehensive decarbonisation.
- Specialist countryside management/education staff are essential.
- Poor quality existing development (which is harmful to landscape character) should not be used as a justification for further poor quality development.
- Respondent does not consider that compensatory measures are ever likely to be effective when there are adverse impacts from development to the AONB.
- Approach does not recognise that here may be circumstances where the setting of the AONB is already influenced by existing development and/or that there may be opportunities to mitigate or enhance the setting of the AONB.
- Disagree with mitigation - should be used as a last resort.

Climate change

Public response

- Need to give precedence to development which will generate clean renewable energy as a priority due to the climate emergency.
- Climate change should be a core consideration.
- Council should give greater weight to the contribution that low carbon technology/renewables make to mitigating climate change when assessing planning balance against impacts on landscape.
- Consider that compromises will need to be accepted in terms of landscape impact in order to reduce Co2 emissions.
- Overriding public interest should not be ignored.
- Increase in electricity generation means the plan should take a more favourable approach to offshore wind - revival of the Poole Bay Wind Farm proposals and the acceptance of the low level of visual impact this would cause to the AONB.
- Policy should refer to climate change the measures needed to adapt (flood mitigation) and mitigate (renewable energy development) climate change.

Area-specific issues

Town and Parish Councils

- Concern with the ineffectiveness of AONB status, in relation to the Vearse Farm approved development in Bridport.
- Suggestion that the protected status of the area surrounding Portland Bill should be heightened and landscape further protected, perhaps with further designations.

Public response

- Proposals to allocate land for homes next to Swanage are inconsistent with this policy.
- Council should consider the effects on landscape character/visual quality of development between Wimborne and Colehill.
- Development in Swanage likely to have an adverse impact on the Area of Outstanding Natural Beauty and mitigation not possible.
- Proposed housing allocation to the north of Dorchester (DOR13) will have an adverse impact on landscape character, and are inconsistent with the proposition to preserve valued landscapes.
- All BEAM allocations should be refused as exceptional circumstances have not been demonstrated.

Alternative approaches

Environmental groups (non-statutory)

- Landscape and habitat value cannot be protected by only considering the statutory designations as 'important' - as the Local Plan does.

Public response

- Suggestion to focus on brownfield land rather than building large scale development in the AONB and Green Belt.
- Council should place an emphasis on avoiding inappropriate development rather than measures to mitigate/compensate impacts on landscape.
- Approach is inconsistent with the parts of the plan relating to protected species/habitats and biodiversity net gain, mitigation and compensation used to justify inappropriate development.
- Considers that Dorset's greatest asset is its landscape - which contributes to health and general wellbeing.
- Should be made clear that existing development forms the baseline for the assessment of new development.
- Need to reset this whole section to prioritise the AONB, green spaces, wildlife etc. All the subsequent policies should be tested against this requirement. Where they fall short then they should be rewritten.
- Need to protect the World Heritage Site and its setting.

6.2. Policy

Policy approach

Town and Parish Councils

- The policies seem to adequately cover the issues.

- Suggest the policy should be re-drafted to give greater effect/more certainty to the requirements.
- Not clear that this policy is consistent with the NPPF.
- The policy is numbered ENVV4 rather than ENV4.
- The policies do not encourage maintenance and enhancement of the landscape as a whole.
- Policy does not reference Green Belt.
- Need to resist inappropriately located development as a matter of principle.
- The wording, even for minor development, is read as being anti any development and makes no cross reference to sustainable development.
- Food security should be incorporated into this policy and the supporting text.
- The plan should reflect that at every stage in the planning process, the public interest and exceptional circumstances tests should be considered.

Natural England

- Supports the policy, subject to amendments.

Dorset AONB Team

- Overall, the policy and supporting text are broadly supported.
- References to seascapes in the text and policy could be substantially widened, reflecting the scenic importance that is clearly attached to much of the Dorset coast.

Cranborne Chase AONB Team

- Items I to IV of ENV4 should include 'skyscape, especially dark night skyscape'.

Local community groups (non-statutory)

- Policy does not appear to be as robust as the equivalent policy in the existing West Dorset, Weymouth and Portland Local Plan. The wording should be strengthened accordingly.
- Some agreement with the suggested approach.
- Replace "should" with "will" throughout ENV4.

Developers/Landowners/Agents

- Support for the approach subject to changes.
- Approach reflects the NPPF and importance of ensuring that new development does not harm landscape.
- Suggests that the requirements should be applied on a case by case basis - needs to be balanced with what the landscape is, in prominence, importance and visibility within the area.
- Landscaping as a concept should not be seen as a catch all and this is not clear from the policy as proposed.
- Wording to align with updated emerging national legislation, policy and guidance as this is confirmed.
- The policy needs to be clearer with its aims, and requirements, as it stands any development could be interpreted as having an impact on the landscape and it needs to be clear that this should be seen in context of the site.

Public response

- Support protection of designated and locally important landscapes.
- Disagree with the drafting of the policy as it is too restrictive.

- Policy should state there will be no consideration given to any proposal negatively impacting on the unique environment.
- Policies do not encourage maintenance and enhancement of the landscape as a whole.
- The drafting of the policy is contradictory - including a general requirement to conserve and enhance along with a requirement to mitigate unavoidable adverse impacts.
- Policy should reference odour and noise as significant considerations in defining a place's value (smells and noise can degrade the appreciation of a landscape).
- Policy is likely to displace inappropriate development outside protected/designated landscapes.
- Not clear that this policy is consistent with the NPPF.
- Approach does not recognise that the landscapes and seascapes vary in value - policy needs to be nuanced.

Criterion I.

Town and Parish Councils

- The policy should state: 'development must conserve and enhance the landscape' rather than 'should'.
- Suggestion that part I. of the policy is in conflict with part II. - Why should an adverse impact be unavoidable? If it is, then the development should not be permitted – need for examples of 'adverse impact'.

Developers/Landowners/Agents

- Not all sites have a functional relationship with the existing seascape and therefore should not be required to conserve and enhance this.
- Criterion I – suggested amendment – “All development should conserve and enhance the landscape and seascape, **where appropriate...**”.

Public response

- Council should ensure that development conserves and enhances as 'seen by the wider public' and not just by developers.
- Part I. of the policy is inconsistent with NPPF - conservation of all landscapes and seascapes is not a national requirement, unless within a designated area.

Criteria II. and III.

Public response

- Endorses Parts II and III of draft policy ENV4 - allow for appropriate mitigation where adverse harm is unavoidable.
- Policy criteria (ii) - replace “should with “will” throughout.

Criterion IV.

Natural England

- Policies as written provide for no exceptional circumstances where significant harm to the visual quality or landscape / seascape character would be acceptable.

Developers/Landowners/Agents

- Criterion IV of ENV4 - stating that development 'will only be permitted' in certain circumstances, does not conform with Para 173 of the NPPF – should be reworded to reflect the NPPF or deleted and replaced with NPPF wording.
- Suggestion to amend the wording of Criterion vi of ENV4 to encourage the redevelopment of appropriate brownfield sites within Heritage Coasts.

Public response

- Part IV of the policy refers to landscape/seascape character and the respondent queries whether the policy would restrict delivery of wind turbines, which would in turn be inconsistent with the council's declaration of a Climate Emergency.
- Requirement to conserve the qualities is not consistent with paragraph 170 of the NPPF.
- Support for limiting development in the Heritage Coast, with additional risk from coastal change.

Criterion V. AONB

Town and Parish Councils

- Consider that the term 'exceptional circumstances' requires explanation and definition.
- Consider that the term 'public interest' requires explanation and definition.
- The section should include a definition of major and minor development.
- Feel that minor development should be subject to a 'lock' that does not allow applicants to claim later that a new proposal would have no adverse impact to landscape due to it already having been damaged by that earlier development.
- Concern with reliance on 'public interest' to overcome statutory obligations.
- Concerned that clause (v) of the policy in question is vague - refers to a public interest test but does not define what the criteria of such a test might be.
- Greater protection of the AONB is required.

Natural England

- ENV4 Clause V - requirement for the provision of compensatory measures to fully moderate any residual impacts should be added - suggests this is achieved by adding, "and a suitable compensation strategy is available" to the first sentence.
- For clarity the AONB policy should also be expanded to include the major development exception circumstances tests as set out in NPPF paragraph 172.
- Further bullet should be added to the criteria for minor development in AONBs to emphasise the importance of wildlife and heritage interests. Suggests the following wording: "it furthers the conservation and enhancement of wildlife and / or cultural heritage".

Cranborne Chase AONB Team

- The policy as currently worded does not apply to major development affecting the setting of an AONB.
- Item V of Policy ENV4 - a significant omission in that conserving and enhancing an AONB are the criteria that developers and decision makers should have in their minds.
- Item V should have an additional bullet point 'it does not harm the International Dark Sky Reserve'.

Wessex Water

- Policy Criteria V - request that the policy clarifies that 'wastewater' treatment assets would normally be deemed to be 'major' development in the Area of Outstanding Natural Beauty but may be justified because of their role in the supply of drinking water to local communities and to ensure safe/adequate treatment of sewage.
- Small scale/ancillary development which generates renewable energy to support the operation of water supply/wastewater infrastructure should also be deemed acceptable (subject to mitigation).

Local community groups (non-statutory)

- ENV4: criteria V – greater clarity is need on definition of “Exceptional circumstances” - to be defined and by whom.

Developers/Landowners/Agents

- Consider that the policy should be amended in order to be consistent with footnote 55 of paragraph 172 of the NPPF - major development being a matter of the decision maker, needing to take into account its nature, scale and setting.
- National policy does not limit acceptable proposals in the setting of an AONB to ‘minor’ development - an unreasonable approach, particularly where parts of the AONB lie adjacent to the built up settlements of key towns in Dorset.
- Part V. - approach does not recognise that not all settings provide a positive contribution to an AONB - concern that there is no flexibility within the emerging policy for appropriate development that would bring significant wider benefits to Dorset.
- Support the allowance within the policy for major developments in the AONB where there are exceptional circumstances, or the development is in the public interest.
- Criteria V is inconsistent with paragraph 172 of the NPPF, in that it does not expand on the considerations which should be applied to major development.
- Query whether the drafting of the policy around major development in the Area of Outstanding Natural Beauty is sound (justified/consistent with national policy).

Public response

- Support for limiting development in the AONB – important to the character of much of Dorset.
- Care needs to be taken regarding abuse of 'exceptional circumstances' – query who defines these?
- Part V of the policy does not define 'public interest' or 'major development'.
- Part V of the policy should be re-drafted inserting the words 'overriding' before the words 'public interest' to create higher threshold for justifying major development in the AONB.
- Should give greater protection and seek enhancement of the Dorset AONB.

Criterion VI. Heritage Coast and the AONB

Developers/Landowners/Agents

- Suggestion to reword the policy to reflect national policy in terms of development within the Heritage Coast – which is more flexible.

Criterion VII. Other valued landscapes

Natural England

- Policies as written provide for no exceptional circumstances where significant harm to the visual quality or landscape / seascape character would be acceptable.

Cranborne Chase AONB Team

- 'or contribute to light pollution in the International Dark Sky Reserve will be refused' should be added to the last sentence of item VII.

Public response

- Designations for valued landscapes cannot be identified - need to be made available in order to consider whether the policy is reasonable.
- Approach is supported.
- The final sentence should be clarified to state that where significant adverse impacts cannot be mitigated, the development will be refused.

Additional criteria

New Forest National Park Authority

- Policy ENV4 could include a criterion recognising that under the 'duty of regard' the proximity of the New Forest National Park and its setting may need to be factored into Landscape and Visual Impact Assessments (LVIAs).

7. Policy ENV5: Heritage Assets

7.1. Approach

Introduction/general comments

Historic England

- The section on heritage assets needs changes to better align with NPPF Chapter 16, such as the use of the word 'conserving' rather than 'protecting' in the title and elsewhere.
- The explanatory text to ENV5 is clear and provides guidance on how it should be applied.
- The information source and date for the heritage asset numbers in 3.6.1 should be referenced, as these may change in future.
- Paragraph 3.6.3 should include reference to 'great weight' being given to the conservation of designated heritage assets reflecting NPPF para 193.

Cranborne Chase AONB Team

- Section 3.6 has a much more upbeat tone than is found in the section simply entitled 'Landscape'.

Swanage Railway

- Suggestion that the Swanage Railway currently or potentially contributes towards the conservation of Dorset's heritage.

Local community groups (non-statutory)

- The heritage throughout the county of Dorset is not considered properly within the Plan and this concern does not appear to be subject to clear forward thinking.

Public response

- General thrust of this section is positive in terms of the language about protecting heritage assets including Conservation Areas from damaging developments.
- Concern that conservation officers' opinions should be accepted above housing targets.
- Concern with use of the wording “minimising harm” to the environment, it should be talking about avoiding harm and about ‘protecting and enhancing its quality, addressing climate change and supporting health and wellbeing’.

Paragraphs 3.6.5 - 3.6.12 - Designated heritage assets

Town and Parish Councils

- Heritage assets should be clearly defined and include natural assets and archaeological ones.
- Would like to suggest separate and more specific reference to the World Heritage Site and the importance of its management, care, and the prevention of unsuitable development which would be harmful to its setting.

Historic England

- Paragraph 3.6.10 should reference the new style and enhanced list entries that can exclude parts of a listed building that are not of special interest.
- Paragraph 3.6.10 should include reference to ‘great weight’ being given to the conservation of designated heritage assets reflecting NPPF para 193.
- Protected wrecks and the grades of listed buildings should be mentioned in the text on designated heritage assets.

Cranborne Chase AONB Team

- Section seems remarkably silent on how the Local Plan intends to facilitate the conservation and management of Registered Historic Parks and Gardens; as well as those of local significance.

Jurassic Coast Trust

- Suggest the addition of a reference to the fact that SSSI and the AONB are the key designations that protect the site, and add a signposting of the Jurassic Coast Partnership Plan as the key conservation and management framework document for the World Heritage Site.

Local community groups (non-statutory)

- Believe the fixing of solar panels to heritage buildings could be appropriate, at least where they can be accommodated largely out of sight and away from the building frontage.

Public response

- Setting of Poundbury Camp will be further adversely impacted, contrary to NPPF paragraph 194.
- Carrying out staged program of archaeological research should inform the basis of amending policies that will affect Poundbury Camp.

Paragraphs 3.6.13 - 3.6.16 - Non-designated heritage assets

Town and Parish Councils

- Heritage assets should be clearly defined and include natural assets and archaeological ones.

- The historic settlement pattern is an important asset of many of Dorset’s villages and should be protected and enhanced where development proposals are submitted – concern that this is not reflected in the policy.
- Paragraph 3.6.15 – query is there a ‘Dorset Local List’ of non-designated heritage assets and if so where is it referenced?
- Non-designated heritage assets identified in Neighbourhood Plans should be given protection.
- Need for a list of non-designated heritage assets in North Dorset.
- Concerned over non-designated heritage assets being afforded the equivalent protection to designated ones.

Historic England

- The term non-designated heritage asset should be used consistently in relation to archaeology instead of undesignated and non-scheduled.
- Paragraph 3.6.15 should clarify whether there are any ‘local lists’ in Dorset and what criteria are used to identify them. It should also refer to HEAN 7: Local Heritage Listing and the funding awarded to establish/improve Dorset’s local list.

Forestry Commission

- Consider including ancient trees in this section to acknowledge their cultural importance.

Cranborne Chase AONB Team

- Section seems remarkably silent on how the Local Plan intends to facilitate the conservation and management of Parks and Gardens of local significance.

Public response

- Concerned at the protection offered to non-designated heritage assets.
- Plan does not mention Gillingham Royal Forest as a heritage asset.
- Detrimental that ‘special character areas’ have disappeared from Local Plan.
- The Council should produce detailed local list of buildings of importance.

Paragraphs 3.6.17 - 3.6.20 - A positive strategy for the historic environment

Historic England

- Paragraph 3.6.17-3.6.20 - The ‘positive strategy for the historic environment’ is welcomed. It should also:
 - refer to Dorset’s Historic Environment Record (HER).
 - discuss climate change effects, mitigation and adaptation and the implications for the historic environment.
 - discuss how heritage conservation could help the recovery of high streets after COVID-19.
 - outline the stewardship of local authority owned heritage assets. explain how greater enjoyment of Dorset’s heritage assets could be achieved. set out that further work will be undertaken to identify heritage assets in or close to the Jurassic Coast WHS.
 - commit to recording and monitoring heritage assets that may be vulnerable to coastal erosion and flooding.
 - and explain more about Dorset’s cultural/literary landscape.

Cranborne Chase AONB Team

- Heritage section has some useful indications on positive approaches to assets and a similar approach should be adopted for conserving and enhancing landscapes.

Public response

- Comment whether the council's planning team is adequately resourced to provide pre-application guidance.
- The council should prioritise reducing greenhouse gas emissions from the existing housing, including that in conservation areas, stock by retro-fitting adaptations.
- Local Plan maintains the status quo and does not do enough to commit to carbon neutrality.
- All buildings need to be comfortable to use otherwise they are not fit for purpose and are not a sustainable asset.
- Paragraph 3.6.20 should encourage the preservation of the story/narrative of heritage assets and how previous generations invested in them.

Paragraphs 3.6.21 - 3.6.27 - Assessing significance

Historic England

- Paragraph 3.6.21 onwards should discuss setting assessments in more detail.

Public response

- Lots of important assets dismissed as being of low impact if they are lost to North of Dorchester development which contradicts the wording of ENV5.

Paragraphs 3.6.28 - 3.6.38 - Assessing harm

Town and Parish Councils

- The term "harm" is only applied to heritage aspects, and should also refer to harm to the climate.
- Paragraph 3.6.34. The use of the word 'only' in the first line seems to weaken this policy.
- The terms 'incongruous', 'poor design', 'scale' and 'inappropriate materials' may be subjective. This could give developers excessive latitude when arguing in support of an application. This policy statement should be redrafted in a more objective manner.

Historic England

- Paragraph 3.6.30 should include a bullet mentioning heritage at risk.

Public response

- Paragraph 3.6.32 should be amended - to reflect the need to consider the impact of developments on the setting of the Conservation Area.

Paragraphs 3.6.39 - 3.6.45 - Weighing public benefits against harm

Town and Parish Councils

- Paragraph 3.6.39 – concern with wording - The Council will be better able to argue refusals based upon the first sentence only. The second sentence should therefore be removed.

Historic England

- Paragraph 3.6.39 should differentiate how harm or loss will be weighed against public benefits and/or significance for designated and non-designated heritage assets.

- Paragraph 3.6.43 needs amendment to adequately cover the alternative tests for substantial harm or total loss of designated heritage assets, as set out in NPPF para 195.

Environmental Groups (non-statutory)

- Paragraph 3.6.39 - We support the weighing of public benefits of a proposal against the harm to heritage asset where historic features are limiting the biodiversity and condition of watercourses e.g. weirs, bridges & water meadows.

Public response

- Consider that environmental benefits should be accorded weight when assessing heritage/listed building consent applications.

Paragraphs 3.6.46 - 3.6.47 - Heritage assets at risk

Public response

- Too often heritage assets are left to deteriorate whilst development is undertaken, after which it has deteriorated so far that permission for demolition is granted.
- Unless elements are fully legally protected, there is risk 'lesser' heritage sites will fall foul of the policies intentions.

Paragraphs 3.6.48 - 3.6.50 - Hidden/unidentified heritage assets

Historic England

- Paragraph 3.6.48 onwards should mention 'building recording' and that recording / survey / evaluation results will be made publicly available in the Dorset HER. It should also include links to Historic England advice on recording.

Public response

- Words about archaeological sites put the onus on developers, rather than planning consents to require interventions.

Climate Change

Town and Parish Councils

- Climate change should be core to every proposal - every settlement must minimise the impact on the climate.
- Listed and Historic buildings should be allowed to change to enable a more sustainable heating method to be installed.
- There should be more emphasis given to environmental concerns when it comes to heritage building improvements - alterations that enable preservation, continuing utility and future-proofing should be allowed.
- The term "harm" is only applied to heritage aspects and should also refer to harm to the climate.
- There will be no heritage to preserve if we do not preserve the environment, now.

Dorset Climate Action Network

- Historic buildings should not be exempted from the obligation to cut emissions – need for flexibility to allow solar panels and increase energy efficiency.

Supplementary Planning Document and further work

Historic England

- A Heritage Topic Paper should be produced to examine the existing evidence base and the need for new evidence.

Environmental Groups (non-statutory)

- Support for the creation of relevant SPD.

7.2. Policy

Policy approach

Town and Parish Councils

- Support for the policy and wording.
- The policy should be amended to reflect the statement in para 3.6.32 and refer to policies of Neighbourhood Plans in this regard.
- Given the number of paragraphs preceding the Policy Box it would appear that ENV5.I to ENV5.VI are insufficient to cover all the preceding issues.
- Suggestion that the policy should be rewritten to the effect that the balance between addressing climate change and preserving heritage should favour the former.

Environmental Groups (non-statutory)

- Supports for section 3.6 and policy ENV5 when taken together with the NPPF.

Developers/Landowners/Agents

- It may be simpler to refer to national policy and guidance, which this policy wording is largely reproducing.
- Policy wording is considered generally acceptable and consistent with the NPPF.

Public response

- Agreement with approach.
- A pragmatic approach that recognises each site has different constraints and contexts and developments vary in type and scale.
- Agree with policy but not convinced it will be implemented effectively - Brewers Quay building Weymouth example of failure of previous policies.
- Policy seems to be a poorly worded rehash of parts of section 16 of the NPPF and reads as very pro-development.
- Policy should only allow development where conservation is the underlying aim.

Criterion I.

Historic England

- ENV5 I should state that 'great weight' should be given to the conservation of the significance of designated heritage assets.

Criterion II.

Historic England

- In ENV5 II delete 'where possible'.

Criterion III.

Historic England

- ENV5 III should more positively encourage proposals that conserve and enhance the significance of non-designated heritage assets and their settings.

Developers/Landowners/Agents

- Criterion III should be deleted - drafting is unsound because the test is inconsistent with national planning policy, specifically paragraph 197 in respect to non-designated heritage assets, and the balancing of harm against significance.

Public response

- Concern with using ENV5 III (development that would harm the significance of a non-designated heritage asset) against wind farms.

Criterion IV.

Town and Parish Councils

- Disagree with ENV5, para IV Heritage assets, archaeological sites and potential archaeological sites should always be protected. Priority should be always given their conservation.
- Suggest an additional criterion to advising that any permission should incorporate safeguards to protect the heritage asset and ensure that it will be restored as a vital part of the development.

Historic England

- ENV5 IV – the use of the term 'direct harm' should be reconsidered as it is confusing and because assets of archaeological interest be harmed indirectly, for example through changes in hydrology.
- ENV5 IV should explain that non-designated archaeological heritage of equivalent significance to scheduled monuments will be assessed as designated heritage assets.
- ENV5 IV should include criteria related to cases of substantial and less than substantial harm to designated heritage assets and their settings, as set out in the appropriate NPPF tests.

Environmental Groups (non-statutory)

- Criterion IV should recognise that the creation of public goods (e.g. the condition of river & floodplain habitat and natural flood management) may require the removal of heritage assets (such as historic artificial weirs or mill features), which prevent beneficial natural processes occurring.

Public response

- Strengthen wording of ENV4 IV as being non-negotiable.
- Is point IV required when guidance is given by Historic England and in para. 202 of NPPF.

Criterion V.

Historic England

- ENV5 V should include criteria related to cases of substantial and less than substantial harm to designated heritage assets and their settings, as set out in the appropriate NPPF tests.

Public response

- Second line of point V does not make sense.

Criterion VI.

Historic England

- ENV5 should not refer to enabling development and this part of the policy should be deleted.

Dorset Catchments Partnership

- Need to acknowledge that in order to create public goods, environmental restoration may require removal of heritage assets which are creating damaging modifications which prevent beneficial natural processes occurring.

Public response

- Strengthen wording of ENV4 VI as being non-negotiable.

Additional Criteria

Town and Parish Councils

- Concern that the protection of the historic settlement pattern of villages is not reflected in the policy. The policy should be amended to reflect the statement in para 3.6.32 and refer to policies of Neighbourhood Plans in this regard.
- Would like to see a paragraph stressing greater emphasis on new buildings making a positive contribution to their immediate and wider historical assets.
- Need for a condition that development must be in accordance with the policies and controls within a Conservation Area Appraisal where this exists.

Historic England

- Add new criterion between ENV5 I & II focussing on the need to understand the significance of affected heritage assets. Development proposals that conserve and enhance the significance of heritage assets should be encouraged.
- Add new criterion after ENV5 II to encourage development proposals that bring redundant, underutilised and 'at risk' heritage assets back into active use.
- ENV5 should include a criterion relating to the Jurassic Coast World Heritage Site, if this policy is to be applied when assessing impacts on its Outstanding Universal Value as stated in the supporting text for ENV6.

8. Policy ENV6: Geodiversity

8.1. Approach

Introduction/general comments

Dorset Wildlife Trust

- Agree subject to amendment - supports this policy but believes it should go further.

Town and Parish Councils

- While not directly a Planning matter, the policy should recognise the need for education and interpretation to help protect geological features from visitor damage.

Jurassic Coast Trust

- Paragraph 3.7.1 – This is a little light on the value of geodiversity to society. Suggest the Geodiversity Charter for England as a source of information for a better contextual narrative here.

Public response

- Support for the policy and approach, with some disagreement with aspects of the wording.

Paragraphs 3.7.2 - 3.7.6 - The Dorset and East Devon Coast World Heritage Site

Town and Parish Councils

- Considers that development within or affecting a World Heritage Site may only be approved by UNESCO.
- Jurassic Coast is a World Heritage Site and the link to ENV5 is very appropriate.
- Support the current approach as outlined in the current wording.
- Concern as to whether para 3.7.6, given the Secretary of State's comments, can sit comfortably with the Dorset Council Climate Emergency Declaration.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Jurassic Coast, and its "setting", is a locally important WHS and the link to ENV5 is appropriate - however should not prevent development some miles from the WHS "setting" where other planning measures would come into play.
- Concern exists whether paragraph 3.7.6., given the Secretary of State's comments, can sit comfortably with the Dorset Council Climate Emergency Declaration.

Pegasus Group on behalf of Persimmon Homes

- Defining the attributes of Outstanding Universal Value within the Plan would be beneficial for users of the Plan and to assist with clear decision making on planning applications.
- This element of the Policy should also be amended to remove the reference to 'likely' – development should only be refused where will be an actual impact on an asset's setting, not a likely impact.

Public response

- Suggestion that there is a need to protect the World Heritage Site.

- Suggestion that the World heritage site gained status due to its geological importance and not necessarily its landscape and setting.
- Paragraph 3.7.2 - Importance of the Dorset coast for its educational value and ongoing scientific investigation, suggestion that the issues should be extended. Information is internationally important, not just for tourists.
- Paragraph 3.7.5 - disagreement with the emphasis of the paragraph, suggest that it needs more emphasis on the cultural significance of the World Heritage Site, as it is a site of knowledge and education.
- Suggestion that changes are inevitable and should be accepted.
- The Jurassic Coast point should also have been reflected earlier in the plan.
- Views may be impacted without basic geology and morphology of a site being disturbed.
- Paragraph 3.7.6 - Disagreement with text in relation to Navitus Bay wind farm - structures would not affect the geological nature of the WHS.
- Paragraph 3.7.6 - Considered unfair that Navitus bay project should be pre-judged in the event that it or a similar proposal were to be revived.

Paragraph 3.7.7 - Regionally Important Geological and Geomorphological Sites

Jurassic Coast Trust

- Paragraph 3.7.7 - Correction needed; in England, Regionally Important Geological Sites have for some years now been called Local Geological Sites.

8.2. Policy

Policy approach

Natural England

- Supports policy ENV6 but recommend that it is expanded to include a requirement for development to seek opportunities to enhance geological interests, for example through the creation of new exposures, or management and or interpretation of existing features.

Criterion I.

Historic England

- At the end of ENV6 I add: ‘...Policy ENV5 also applies to development within the World Heritage Site or that affects its setting.’.

Persimmon Homes (South Coast)

- Criterion I of the Policy states that development will only be permitted if it can be satisfactorily demonstrated that the ‘Outstanding Universal Value’ of the coastline and its geology will be preserved. Defining the attributes of Outstanding Universal Value within the Plan would be beneficial for users of the Plan and to assist with clear decision-making on planning applications. Should also amend this to remove reference to 'likely' - development should be refused where there will be an actual impact on an asset's setting, not a likely impact.

Additional criteria

Dorset Wildlife Trust

- Suggestion of additional policy criteria – “Opportunities to enhance understanding of or access to geological features through retaining, enhancing, creating or interpreting them should be taken through planning agreements”.

9. Policy ENV7: Achieving High Quality Design

9.1. Approach

Paragraph 3.8.2 - Placemaking

Natural England

- Paragraph 3.8.2 - criteria should include the need for design of places to reduce carbon emissions and enhance wildlife interests.

Historic England

- Paragraph 3.8.2 should mention place-shaping as well as place-making.

Environmental groups (non-statutory)

- Para 3.8.2 - suggest that the following change is made to the last bullet and a further bullet is added to the list:
 - reduce resource and energy use and are resilient to climate change.
 - enables nature-friendly development and access to nature for all.

Town and Parish Councils

- Important to understand that placemaking is the integration of a set of patterns in a hierarchy, down to and defined by the typology of construction detail.
- Remove "are resilient to climate change" and replace with DO NOT CONTRIBUTE to climate change.

Public response

- Development in whatever form (infrastructure as well as buildings) cannot take place in isolation as the environment around it has to be repaired so that the whole area can be viewed as coherent and sustainable.

Paragraph 3.8.3 - A sense of place

Cranborne Chase AONB Team

- The approach to good design seems to omit the crucial analysis of place and character in order to determine ‘genius loci’.

Environmental groups (non-statutory)

- Developments should clearly take account of local vernacular and heritage, architecture and materials.

Local community groups (non-statutory)

- There is a place for good quality contemporary design where it enhances the local area.

Town and Parish Councils

- Paragraph 3.8.3 should recognise that heritage assets often contribute to sense of place as well as to legibility, identity and distinctiveness.
- There is a place for good quality contemporary design where it enhances the local area.

Paragraph 3.8.5 - Links to other policies

Environmental groups (non-statutory)

- Should point new development towards sites which offer durability and long-term value; and away from sites, such as floodplains, coastal lands avoiding erosion, high value sites for nature conservation or carbon sequestration.

Developers/Landowners/Agents

- Welcomes the policy drive to improve the quality of housing design.

Public response

- Need an amenity policy to protect neighbour privacy and minimal distance between dwellings.
- There should be a further point stating that any Town, Parish or local plan is taken into account.
- A whole approach to building and open space has to come forward after COVID-19.

Figure 3.5 - Principles of good design

Natural England

- Supports the principles set out in Figure 3.5.

Historic England

- Figure 3.5 should set out that repairing, retrofitting and reusing historic buildings should be a priority for meeting the Government's net zero carbon target by 2050, taking into account their embodied carbon. The biodiversity section should recognise that blue and green infrastructure networks can be used to conserve heritage assets.

Network Rail

- Links to the topic of First Mile Last Mile and how people access the rail network or continue their journeys.
- Another principle outlined is Healthy and Inclusive which refers to walking and cycling being encouraged by the layout of developments.

Wessex Water

- The Amenity aspect should be expanded to recognise the need to locate new development away from existing sources of odour/vibration/flyies as well as noise.
- The Biodiversity aspect could include a reference to the need to enhance as well as protect and retain.

Forestry Commission

- Design and layout of the development site is extremely important when considering the protection of neighbouring ancient woodland and other ecosystems.
- An appropriate land use layout and management plan, for areas adjacent to sensitive sites or within close proximity to woodland edges, is essential.

Forestry England

- Suggest 50m buffer zone between edge of development and woodlands and increasing connectivity through the site. Buffer between back gardens and woodland edge to avoid dumping of garden waste.

Cranborne Chase AONB Team

- Cross over with section 3.5 - Importance of the location of development within the landscape, and aspects of their design that integrates with the established landscape.
- Figure 3.5 omits the key aspect of a location of development within the existing landscape / townscape, and the fundamental issues of scale and form.
- The final factor in that table of 'quality' should be environmental sustainability rather than biodiversity.
- The evening and night-time environment need to be considered – lighting should comply with Dark Night Sky criteria to provide good lighting without light pollution.

Public Health Dorset

- Respondent queries whether the supporting text could be more explicit in outlining the types of place that the local plan should be aspiring towards, for example 20 minute neighbourhoods.
- Respondent welcomes any measures, or standards, for provision of adequate food growing space that can provide space for community food growing as part of development.

Dorset Catchments Partnership

- The Biodiversity in Figure 3.5 should read “Places retain, protect and enhance existing natural features...”.

Environmental groups (non-statutory)

- Under Adaptability & Resilience refer to Green Infrastructure.
- Under Biodiversity include “any new tree, shrub, etc. must be native and appropriate to local area, to provide biodiversity gain. No non-native invasive species will be allowed” and “lighting schemes will avoid conflict with biodiversity”.
- Principles of good design should be amended.

Developers/Landowners/Agents

- The principles of good design set out in Figure 3.5 should either be incorporated in the policy wording itself, or deleted from the supporting text and added to the forthcoming Design SPD.

Town and Parish Councils

- Figure 3.5 could also include a requirement that driveways in new developments should be of permeable nature in order to avoid degradation of natural ground water systems.
- Statements of good design should include comment about the use of fire proof exterior cladding in multi-storey developments.
- Figure 3.5 largely relates to urban design; is not readily interpreted for rural sites or infill projects.
- Identity and distinctiveness – concern that phrasing appears to be saying everything and nothing at the same time.

Public response

- Principles of good design should include combatting climate change as a quality.

- Local distinctiveness should be a guiding planning principle - need architectural references and infrastructural integration.
- Should cross reference SuDS section re hard landscaping.
- Recommend a preference for native species where appropriate (i.e. resilience to climate change).
- Re “Adaptability and Resilience” Change the first sentence as follows “Buildings are carbon neutral and adaptable etc.....”.
- Importance of homes for mixed communities, and not isolating older people from the town centres.
- A whole approach to building and open space has to come forward after COVID-19.
- Respondent considers that there is not much about urban design and new estate design to encourage active travel & discourage private vehicle use for short journeys (such as the school run), references 15-minute cities.
- Respondent considers that the local plan should set out clear design constraints to the access of cars into residential environment with vehicle parking on edge of developments, in Europe this results in bike pooling schemes, and references Marmalade Street in Cambridge as an example.

Paragraph 3.8.6 - Achieving high quality, sustainable design

Town and Parish Councils

- “High quality” design is a subjective term – lack of a set definition and examples.
- Need to clarify that ‘high quality design’ applies to all forms of development whether small scale, extensions and/or external alterations, and whether they can be seen or not.
- Local town and parish councils should also be consulted at an early stage.

Paragraph 3.8.7 - Design Supplementary Planning Document (SPD)

Town and Parish Councils

- Welcome the development of the Dorset Council Design Supplementary Planning Document.
- SPD should reflect the Bridport Area Neighbourhood Plan and others.

Historic England

- Paragraph 3.8.7 should recognise that conservation area character appraisals and management plans are useful sources of information.

Environmental groups (non-statutory)

- Paragraph 3.8.7 – The Council’s Design SPD should include details of the required approach to on-site planting currently being prepared by NET.

Developers/Landowners/Agents

- To aid the implementation and interpretation of design policies, it will be important that locally produced design guidance/masterplan is consistent in its approach, and that there is broad conformity with national policy and guidance.
- Design SPD should be consulted on along the same timescales as the Local Plan.

Public response

- SPD must be consulted upon, with stakeholders given the opportunity to comment on the document when it has been drafted.

Paragraphs 3.8.8 - 3.8.11 - Planning applications and design process

Town and Parish Councils

- Paragraph 3.8.9 - For strategic housing sites, applicants must submit a masterplan covering the whole site for approval at the first stage.
- The policy should include a statement that the Council will assess development proposals using the design toolkit Building for a Healthy Life (BHL).
- Benefits of design review panels - including representatives of the local communities, which can assist the designers at early stages, as well as through the full design process, in a collaborative format.
- Noted that Government introduced, on 30 Jan 2021, New Design Codes in draft for new developments.

Environmental groups (non-statutory)

- Importance of pre-application processes for significant development schemes - ensure high design standards and to reduce the risk of permitting unsound development projects.
- Suggestion that for major development schemes a planning brief should be prepared by the council or agree a masterplan with the developer.

Public response

- Importance of pre-application processes for significant development to ensure high design standards.
- Suggestion to appoint a design officer at senior level to ensure high quality design guidance.
- Approach should reflect design policies in neighbourhood Plans.
- Considers that the council should set up design review panels for each functional area, including representatives from local communities.
- Will need to engage with local communities as part of developing design codes.

Suggested design standards and features

Go South Coast Buses

- Importance of ensuring easy access to the bus network – planning should consider walking distance to bus stops and bus catchment areas and suggests 500m to core bus corridors, 400m to single high-frequency use, 300m to less frequent uses and 250m from town/city centres.
- Reference to design standards of bus stops.

Cranborne Chase AONB Team

- Section does not mention the Government's current focus on 'build better build beautiful'.

Environmental groups (non-statutory)

- The inclusion of new blue and green infrastructure networks and Sustainable Drainage Systems (SuDS) in new developments is supported.

Developers/Landowners/Agents

- Aim is to design and build properties of exceptional quality, without compromising on material or attention to detail.

Town and Parish Councils

- Need to set standards for gardens, cycle and bin stores, sheds etc, as well as garden space for children to play.
- Need to consider new National Model Design Codes in the policy.
- Requirement in national policy to develop local design codes with engagement with local communities.
- All new homes should be accessible as standard and designed to be adaptable to changing life circumstances.
- A Design Code should be required for particularly sensitive/substantial sites.
- The section and policy should make development compliant with the 'Build Better, Build Beautiful' commission guidelines.
- Standards that address climate change and biodiversity should include a requirement to fit future-proofing measures at the outset, rather than to build in future flexibility to do so.
- The standards should accord with the Bridport Area Neighbourhood Plan design for living policy.

Public response

- General concerns that development will not be high quality.
- Local plan will need to consider the National Model Design Code and the requirement in national policy to develop local design codes.
- Should have clear design constraints on the access of cars into the residential environment with the concentration of vehicle parking on the edge of development.
- It is expected that the council will respect the design codes set out in Neighbourhood Plans.
- Suggestion that all buildings have to be architect designed, not off the shelf - enhance the local town's characteristics.
- Suggestion of moving towards eco-town status.
- Landscaping, trees, outdoor spaces and other life enhancing non-polluting plans must be met.
- There should be adequate space standards to ensure peoples' wellbeing, especially in view of more working from home post-Covid.
- Some houses should have garages, whilst others should have storage areas or space as part of the house plus a carport or parking space.
- Lower density and more open space recreation and biodiversity is required.
- Need to update existing homes in terms of modern heating systems and waste disposal/recycling.
- Suggestion of small cottage style designs, with local materials, and emphasis on interior ergonomics.
- Semi-detached housing seems to be the most external compromise, promoting friendly contact and awareness.
- Need for a more flexible approach to retrofitting and installing renewables on historic buildings.

Climate change and sustainability

Town and Parish Councils

- The plan should set more ambitious/more effective requirements around sustainable construction and design.
- Need for explicit recognition of the climate emergency and the urgent need to address it.
- New developments must have housing with a low carbon footprint and be "future-proofed" to adapt to and address climate change.

- It should be mandatory for new homes, extensions, and business premises to have provision for heating and ventilation using sustainable renewable energy sources, and a high standard of insulation.

Environmental groups (non-statutory)

- Endorse the need to secure high quality and sustainability in the design of new buildings, with a particular focus on Adaptability and Resilience.
- Importance of resilience of housing in the face of climate change and in relation to the Climate Change Strategy.
- Need to promote the choice of aspect, layout and vegetation which maximises the direct use of the energy of the sun.
- Need to retain and extend natural features such as woodlands, hedgerows, green spaces, streams and ponds.

Public response

- High energy efficiency and meeting national standards is not sufficient.
- Need to include a 'net zero' standard for all new housing and other building development – as soon as possible.
- Importance of securing renewable energy in design.
- Need to promote the choice of aspect, layout and vegetation which maximises the direct use of the energy of the sun.
- Need to retain and extend natural features such as woodlands, hedgerows, green spaces, streams and ponds.

9.2. Policy

Policy approach

Town and Parish Councils

- Support for the policy aspirations.
- Concern that the policy is 'thin'.
- Wish to see the policy strengthened – National Design Code should be the minimum standard.
- The need for a clear outline of how the principle of good design will be enforced.
- Concerned that the policy will lead to subjective judgements.
- The wording of this policy should include explicit recognition of the climate emergency and the urgent need to address it.

Dorset County Hospital NHS Trust

- Unsupportive - policy is too subjective given the publication of the National Design Guide and the current consultation on the revisions to the NPPF and the National Model Design Code.
- Greater clarity to the requirements of the policy can be provided.

Local community groups (non-statutory)

- Agreement with approach - Reflects National policy and BANP policy D8.

Developers/Landowners/Agents

- Support for the policy and approach.
- Welcomes the policy drive to improve the quality of housing design.

- It may be simpler to refer to national policy and guidance, which this policy wording is largely reproducing.
- The wording needs to be more robust and to ensure that this is undertaken.
- The Government direction on this matter is clear, and the places should be “beautiful”. The above policy does not seem to push this enough.
- The policy could also be seen as stifling emerging or innovative design practices.
- The policy should add greater clarity as to what is expected and refer to table 3.5.

Public response

- Support the approach of achieving high quality design, including high quality contemporary design.
- Query whether the policy aims/objectives will be applied/enforced.
- Suggestion that the policy could go further in terms of sustainable construction/design.
- Concern that the approach is written for an urban context – does not relate to small village sites.
- Disagree - Not detailed enough to control design quality - Design Guidance required.

Criterion I.

Town and Parish Councils

- Suggest that Clause I of the policy should be revised to ensure the decision maker takes account of 'local vernacular style'.

Public response

- Should do more to address lack of local character and vernacular.

Criterion II.

Town and Parish Councils

- Suggestion that to some extent criteria ii and iii overlap.

Criterion III.

Town and Parish Councils

- Concern that the inclusion of criteria iii suggests that mediocre design is acceptable.

Criterion IV.

Sport England

- Advocates for the inclusion of our Active Design Guidance as point iv. The guidance has been reproduced in conjunction with Public Health England.

Additional criteria

Town and Parish Councils

- Every new development should facilitate and prioritise active travel on foot and bicycle, by provision of segregated and direct routes which are maintained to a high standard for all year use and by implementing a 20mph speed limit throughout it.

Go South Coast Buses

- Suggestion of a new policy in relation to walking distance to bus stops and bus catchment areas, and design of bus stops.

Public Health England

- It would be helpful to ensure, where appropriate, consideration is given at the design stage to incorporating suicide prevention measures into new buildings/public spaces.

Dorset Police

- Need to ensure that crime prevention and access for the emergency services is an important design consideration with a sites masterplan and the finer design detailing.
- Importance of consultation with emergency services in the design process.

10. Policy ENV8: The Landscape and Townscape Context

10.1. Approach

Introduction/general comments

Town and Parish Councils

- Priority should be given to policies of the Loders Neighbourhood Plan in matters of historic character, materials and local distinctiveness.

Dorset County Hospital, NHS Trust

- Approach should be revised to reflect needs of large-scale employers and public service providers based on the sustainable benefits of doing so.
- Support importance of development contributing positively to enhancement of local identity and distinctiveness.
- Reference to the hospital campus and that the policy may need to recognise that new development may need to take place where it does not always respond to the immediate character of the area.
- Importance of healthcare in a sustainable location needs to have considerable weight attached.

Local environmental groups (non-statutory)

- Policy ENV8 - Not all new development will be surrounded by townscape: most of the sites being brought forward in the draft Local Plan are currently Green Belt so their relationship to the natural environment is critical.
- Paragraph 3.9.1 - The context of a place, particularly current greenfield sites on the rural/urban interface, is closely linked with its biodiversity and not just landscape - critical in producing planting schemes if they are to deliver biodiversity benefit and not to look totally incongruous - Design of planting schemes must reflect this link.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Agreement with the approach.
- However, single one-off examples (e.g. the Sage, Gateshead) can “place an area on the map”.

Developers/Landowners/Agents

- Agreement with the policy wording.
- Suggestion that policy ENV8 should be deleted and the wording added to the Design SPD or policy ENV7, for reasons of brevity and to simplify the Plan.

Public response

- General agreement with the approach.
- Townscape context should be mutually exclusive with the aims of energy efficiency and renewable energy measures.
- Concern with the delivery and enforcement of the approach.
- Query could the policy be stronger in terms of using native species.

Paragraphs 3.9.4 - 3.9.5 - The siting of buildings

Town and Parish Councils

- Development in whatever form (infrastructure as well as buildings) cannot take place in isolation as the environment around it has to be repaired so that the whole area can be viewed as coherent and sustainable.

Paragraphs 3.9.6 - 3.9.7 - External space provision

Town and Parish Councils

- Considers that paragraph 3.9.7 should be amended to introduce a stricter requirement around outside amenity space for new homes.
- Concern with smaller garden sizes in new development.
- The policy should ensure sufficient private garden areas.
- Importance of open gardens to health and well-being of residents, 'greening' of built-up areas, and provision of wildlife corridors particularly in rural settlements.
- More emphasis needs to be given to residential gardens in the policy - considerable pressure for paving/concreting over gardens and fields to provide parking for vehicles and impacts of resulting increased run-off.

Cranborne Chase AONB Team

- Paragraph 3.9.7 – Support.

Local environmental groups (non-statutory)

- Paragraph 3.9.7 - External space provision - mechanism and funding for long term maintenance and care of existing mature trees and hedges should be conditioned.

Public response

- Concern that paragraph 3.9.6 misses reference to the location and form of development, or making effective use of land.
- Policy does not mention need for adequate garden size, proportionate to dwelling size that meet the occupiers' needs.
- Support the aim of existing mature trees and hedges being incorporated into public realm rather than private gardens.
- All developments should be limited to 20 homes per acre ensuring that the new housing we develop are spacious, and more aesthetic.

Paragraph 3.9.8 - Landscaping

Natural England

- Paragraph 3.9.8. - In order to maximise biodiversity value soft landscaping (trees and planting) should prioritise the use of native or traditional species and varieties (for example fruit trees, disease resistant elm, etc).

Cranborne Chase AONB Team

- Support. Recommend including a preference for native species where appropriate (i.e. where resilient to climate change).

Local environmental groups (non-statutory)

- Paragraph 3.9.8. Amend to 'Soft landscaping with appropriate native trees, shrubs, etc.'
- Paragraph 3.9.8 Landscaping - Landscaping and planting design of a development should reflect the natural landscape in form, species selection and seasonal changes in colour and should form part of the overall design criteria for a site. Suggestion of additional wording – "Planting should provide biodiversity benefit throughout the year with no risk to local habitats or native species: trees should be sufficiently mature to make meaningful contributions to landscape and ecosystem services generally."

Public response

- Concern with numbers of anomalies on our streets which a simple amendment to policy could begin to address.

10.2. Policy

Policy approach

Town and Parish Councils

- Acknowledges that the policy reflects national policy and policies of the Bridport Area Neighbourhood Plan.
- Important to understand that placemaking is the integration of a set of patterns - in a hierarchy of regions, towns, neighbourhoods, building clusters, individual buildings and the spaces within, down to and defined by the typology of construction detail.
- It should be made clear that the policy applies to all forms of development whether small scale, extensions and/or external alterations.
- Concern that the policy is written for an urban context.
- The parish council considers that developments should incorporate the use of local materials and architecture. (Beaminster Town Council).

Historic England

- Amend the policy and text to recognise:
 - that townscape, landscape and seascape contexts are often historic.
 - their potential relationships to the settings of heritage assets; and
 - that heritage assets can make positive contributions to their character, local distinctiveness, and quality.
- Wording changes are suggested.

Criterion I.

Local environmental groups (non-statutory)

- Policy criteria I - Amend to “natural landscape character”.
- Policy criteria I - amend to read: “... its immediate setting and the adjacent natural and built environment both of which should be respected and enhanced”.

Public response

- Disagreement with the policy and especially criteria I – need to align with national policy and be clearly and specifically limited to low density and sub-urban development.

Criterion IV.

Local environmental groups (non-statutory)

- Policy criteria IV - Amend to “soft landscaping (i.e. native and appropriate)”.
- Policy criteria IV - Amend to read: “... hard and soft design features and planting to integrate...”.

11. Policy ENV9: Achieving high levels of environmental performance

11.1. Approach

Paragraphs 3.10.1 - 3.10.2 - Introduction

Town and Parish Councils

- Paragraph 3.10.1 - ‘High standards’ are not enough. ‘The highest standards’ is where the plan should be aiming.
- Paragraph 3.10.2 - heritage interest is important, but it’s not as important as addressing an existential threat to humanity. Should read: ‘compatible with their heritage interest wherever possible.’

Achieving and enforcing energy performance targets

Town and Parish Councils

- Dorset Council can play a major role in bringing about changes - need to provide more assistance to the public.
- Planning Authority need to consider the workload on building inspectors and planning with these extra developments – concern with high workloads and vital aspects being missed.
- A requirement that all new developments should include electric vehicle charging points should be included in this policy.

Public response

- Respondent stresses the importance and significance of achieving high standards of environmental performance.

Alternative and additional approaches/requirements

Environmental groups (non-statutory)

- Suggestion of awarding grants to remove hard surfaces and dig up driveways.

Local community groups (non-statutory)

- Suggestion that a travel plan must be submitted for all proposed developments falling within the scope of the policy.

Town and Parish Councils

- BTC asks that the Local Plan aligns with the Bridport Area Neighbourhood Plan in seeking to set standards for new homes that go beyond the minimum required by Building Regulations.

Public response

- Welcome the call for high environmental standards for new buildings.
- Would like to see some commitment to a timescale for aims - in keeping with the Council's commitment to zero carbon by 2040.
- All developments should be designed to achieve very high levels of environmental performance
- Standards of performance need to be quantified.
- Need to monitor how the policy is translated into reality and so assess its success – update definitions of high levels of performance.
- Concern with having to retrofit new buildings in a few years' time due to out of date standards.
- Section should have a stronger and more clear reference to climate change being the primary factor in housing design.
- Many places where the section/policy wording and the intention need to be far firmer - 3.10.2, 3.10.3, 3.10.5, 3.10.6.
- The Centre for Sustainable Energy can help in writing strong policies for the future.
- Development proposals should include a statement demonstrating on how zero carbon will be achieved.
- Achieving high quality design is not a separate issue to Context or Environmental Performance.
- Communal housing can reduce energy costs and emit less CO2.
- Self-built and custom built housing should be permitted outside the settlement boundary or outside and adjacent to the settlement boundary where the house provides a high level of sustainability and passive energy efficiency for use as a primary residence.
- For Housing, a third Strategic Priority should be added; Contribution to combat Climate Change and to strengthen biodiversity.
- Requirements for sustainable construction and design should be applied through building regulations.
- Quality and standards to which houses should be built should be in housing chapter.

Paragraph 3.10.3 - nationally recognised assessment of environmental performance

Town and Parish Councils

- Paragraph 3.10.3 - Any future reworking that has a significant impact on the environment should be subject to a heavy fine or withdrawal of permission for later stages of development where applicable.
- Paragraph 3.10.3 uses the term BREEAM communities without prior definition of BREEAM.

Dorset County Hospital NHS Trust

- Object to paragraph 3.10.3 - should be in accordance with NPPF para 150 and not reference national assessment process.
- Should not enforce BREEAM as this can place unnecessary developer burdens for public service providers.

Wessex Water

- Assessment methods such as BREEAM are typically designed to evaluate standard building types, with performance assessed in terms of improvements over the minimum established in Building Regulations. As such they may not be suitable for buildings which house plant and infrastructure.

Developers/Landowners/Agents

- The text mentions BREEAM, but this is generally not used for residential developments.

Public response

- Paragraph 3.10.3 - Requiring a BREEAM Communities assessment is in and of itself is meaningless - essential that the required rating is specified, ideally a high standard.
- The use of BREEAM Communities assessment is to be welcomed.

Paragraph 3.10.4 - Impact on the character of the area

Town and Parish Councils

- Aesthetics must not be put before addressing an existential threat to humanity.
- Commenting on the content of Paragraph 3.10.4 the respondent notes that new buildings must prioritise high levels of sustainability but not be incompatible with existing character of an area. Good design will be expected to keep both objectives in mind. (Dorchester Town Council).

Paragraph 3.10.5 - Methods for achieving high energy performance

Town and Parish Councils

- Paragraphs should also reference heat pumps, air source heat pumps and community heating proposals.
- Greater emphasis must be made on all new build having renewable energy built in wherever possible.
- All new developments need to have photovoltaic panels, and either ground source or air heat pump heating systems, together with all other possible energy reduction systems installed.
- Wherever possible new buildings and extensions should be aligned to provide a south-facing roof for solar-power capture.
- Policies needed to promote conversion to sustainable heating sources in existing homes.
- Passive housing should be specified and not merely 'considered where appropriate' - concerns with viability restricting policy requirements.
- Add "by inclusion of methods suggested in paragraphs 3.10.4 and 3.4.7."
- The use of words such as "can" and "may" leave the decision to the developer; these words need to be changed to "will" and "must".
- Emphasis must be given to make provision for ground or air source heat pumps for heating homes and business premises, in all new build and extensions to existing buildings.
- Wherever possible new buildings and extensions should be aligned to provide a south-facing roof for solar-power capture.

- In reference to Paragraph 3.10.5, the town council suggests that drafting of the supporting text is revised by adding the following text:
 - ‘by inclusion of methods suggested in paragraphs 3.10.4 and 3.4.7.’ (Dorchester Town Council)

Natural England

- Recommend that measures for achieving water use efficiency are included.

Wessex Water

- Supportive text should also identify the objective to reduce water use as well as energy consumption.
- Would like to see the policy incorporate greater flexibility for infrastructure development. May be restricted in our choice of building materials. For buildings housing equipment, cooling may be more of a consideration than heat retention. The position and orientation of buildings on site will be informed by operational considerations and size constraints.
- The supportive text identifies the role that onsite renewable generation can play in reducing energy consumption – requests support through the local plan for water infrastructure installations in rural locations incorporating small scale renewables. If located appropriately, these have minimal impact on sensitive landscapes/heritage designations.

Sport England

- Sports clubs should be signposted to Sport England specialist guidance:
<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance>.

Forestry Commission

- Consider cradle-to-grave embodied carbon in building materials.

Cranborne Chase AONB Team

- Concern with unintended consequences of installation of ground source heat pumps – significant excavation and impact on habitat, landscape, and archaeology.
- Advises taking a more robust line in relation to solar panels and photovoltaics in all new build situations because from a design perspective it is more appropriate to build these panels into the basic structure than to retrofit as surface mounted accessories.

Environmental groups (non-statutory)

- This policy should specifically seek to reduce water wastage and promote water re-use in buildings.
- No reason why solar panels or solar water heating mechanisms shouldn't be a requirement for all newbuilds.
- New housing should require (under building regs) the production and use of renewable energy – heat pumps, solar panels, including during retrofits, and provision of electric vehicle charge points.

Local community groups (non-statutory)

- All development proposals should have adequate space for re-cycling, cycle parking, electric vehicle charging, and superfast broadband, unless it is not feasible to do so.

- Suggestion that the energy use of a building depends on decisions on location and orientation as well as design – benefits of solar gain, shelter in cold weather and protection from excessive heat in hot weather.
- Where it appears possible to take advantage of a district heating scheme, and the energy for that scheme comes from a renewable source, then if it is proposed not to do so the developer must demonstrate that it is not feasible to do so.

Public response

- Paragraph 3.10.5 - wording has no teeth, amounts to a wish list without any compulsion.
- The second bullet point refers to the use of renewable energy as opposed to energy derived from fossil fuels - should not be confused with energy consumption which is a separate issue.
- The list of possible methods should be compared to the UK housing: Fit for the future? by the Committee on Climate Change (CCC).
- Solar arrays should be standard - any new build with a SE, S or SW facing roof should have solar PV and solar thermal panels installed as part of the initial build.
- Importance of orientation of buildings to make use of passive solar gain.
- Use of geo-thermal and air source pumps should be used for heating especially for, but not exclusively, more rural properties - no oil or propane.
- All new buildings should include an assessment of the viability of adding solar roof panels for the provision of green energy.
- All lamp posts should be fitted with a PV panel and/or wind generator.
- Use of timber in construction should be maximised as a way to not only reduce the buildings carbon 'footprint' but also as a means of locking up carbon.
- Reduce water usage and pollution - water saving targets for fitted appliances should be applied.
- Need for a standard recommendation for soakaways within a site where not covered by SUDS provision in ENV14.
- Need to insist on wastewater recycling.
- Incorporate green rooves/trees or shrubs in garden/mini evergreens in window boxes of flats.
- Need for high standards of building materials and insulation.
- Need for more modular housing schemes.
- No gas boilers or wood burners.
- Government intention to phase out gas boilers by 2025 - lack of reference to this in the policy.
- No tarmac drives.
- Suggest the use of hydrogen technology.
- Should sacrifice costly design features on new buildings in lieu of energy efficiency measures.
- Every house should have a garage and electric charger.

Paragraph 3.10.6 - Future Homes Standard

Environmental groups (non-statutory)

- Need to go beyond the current required standards now so as to require net zero carbon standards in all new buildings – not wait until 2025.
- The text should have links to the policy guidance, such as the Future Homes Standard.

Local community groups (non-statutory)

- Suggestion that Recent Government proposals in the Future Homes Standard expect all new homes to be net zero ready by 2025.

Public response

- Concern with waiting until 2025 for the Future Homes Standard – need to address the issue sooner.
- Paragraph 3.10.6 - concern that government standards will be watered down due to developers' interests.

Paragraphs 3.10.7 - 3.10.8 - Historic buildings

Town and Parish Councils

- Paragraph 3.10.2 - heritage interest is important, but it's not as important as addressing an existential threat to humanity. Should read: 'compatible with their heritage interest wherever possible.'
- Heritage buildings that are unable to meet required standards should be declared 'unfit for human habitation'.
- Need to get priorities in the right order - Climate change is so serious that there may be no one around in 100 years to enjoy these buildings.
- Paragraph 3.10.8 - Agreement with wording.
- The policy should include specific reference to enhancements to listed buildings and buildings in conservation areas.
- Paragraph 3.10.7 mentions use of energy efficient boilers - How will this policy be affected by changes to national policy that will ban the use of gas boilers in new build properties in the future.

Historic England

- Paragraph 3.10.7 should be more positive about the contribution heritage assets can play in relation to climate change mitigation and adaptation.
- Links to Historic England information on this subject should be added.

Environmental groups (non-statutory)

- There should be flexibility on permissions to install energy-saving measures on listed buildings, for example approving double glazing that is designed to be in-keeping with the style of the listed building.
- Concern with 'red tape' barriers to retro fitting listed buildings and homes in conservation areas.
- Paragraph 3.10.8 - Solar panels cannot irreversibly damage the historic fabric of a building - can be removed at a point when our technology has improved.

Public response

- Welcome the acceptance that a listed building may have energy efficiency measures and possible solar panels on the roof, provided the appearance of the main views of the house are not affected.
- Planning permission should encourage a more flexible attitude to double glazing, allowing porches where practicable, and insulating walls from the inside.
- Need for commitment to retrofitting buildings in Conservation Areas - might require incentives for changing to renewable energy heating systems and improving insulation.
- Installation of PVs within the curtilage of a listed building could be possible provided they would not damage historic fabric and would not impact on views of the building.

- Churches are important potential sources of renewable energy by photovoltaics - a large expanse of South aspect roof at often the right angle for PV, and parapet to minimise visual impact.
- PVs would help minimise carbon footprint of churches.
- Should consider temporary permissions for solar panels on listed buildings and in conservation areas.

Standards of energy performance

Town and Parish Councils

- Considers that the local plan should include clear and non-negotiable requirements around sustainable construction/design.
- All development should seek to incorporate sustainable construction/design.
- Environmental performance levels should be objective and clearly defined.
- Consideration needs to be given to adopting the BREEAM 'excellent' standard for new developments.
- Suggestion that developments should include high standards of insulation.

Environment Agency

- Recommend specifying a water use limit of 95 litres per person per day in new residential development - would contribute significantly to meeting objectives relating to carbon net zero, biodiversity protection, groundwater protection and more.
- Specifying 95 litres per person per day (as submitted in a water use calculator as part of planning applications) would be clear, easily implemented (using modern fittings/appliance technology) and would not risk the viability of development.

Sport England

- Passive design should be one of the bedrocks as well as BREAM in designing and developing schemes.

Dorset County Hospital NHS Trust

- Should advocate a fabric first approach to reduce energy need, then layout and then use of renewables.

Dorset Wildlife Trust

- Tougher requirements will be required more quickly.

Environmental groups (non-statutory)

- Importance of acting now - carbon neutral measured independently should be the normal and required standard.
- The term "high standards" has no real meaning unless specific quantifiable measurements are set out.
- The standard of house building needs improving. If we had a policy mandating passive housing then the builders wouldn't build as many houses as they would say couldn't afford it.
- Concern that new homes are still being built with gas boilers installed.
- Concern that current national standards are insufficient to meet Climate Strategy goals or meet challenges of climate change.

- Reference to the White Paper (February 2017) - local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.
- Reference to Ministerial decision following FHS consultation - local planning authorities will retain powers to set local energy efficiency standards for new homes.
- Suggest working with other local planning authorities in the south west on energy performance standards.
- New housing should promote the use in construction of bio-based materials which have low embodied energy and which lock-in carbon – such as timber and straw, and contribute towards a circular economy.
- All new dwellings to immediately be built to life time standards and be carbon neutral without fail.

Local community groups (non-statutory)

- Urge the Council to go beyond the current required standards so as to require net zero carbon standards in all new buildings.
- Little thought is given to how new homes should be using modern materials to reduce the carbon footprint and be more energy efficient.
- Suggestion that plans for more than 200m² floor space must include an estimate of all the emissions associated with the construction and potential future demolition of the structure, with specific targets of lower than Xkg CO₂ per m² unless the developer can show why it is not feasible to meet this figure.
- Suggested initial, target of a 40% reduction in carbon emissions from the 2013 Building Regulations compliant base case running to 50% after 2026 and 100% after 2030, or whatever higher Building Regs standards that might come in in the Plan period.
- Suggestion that carbon offsetting is used when emissions requirements can't be met.

Developers/Landowners/Agents

- Does not consider that there is likely to be a need for the council to set localised energy efficiency standards.
- The Council should not be setting different targets or policies outside of Building Regulations.

Public response

- A need for very high standards of energy performance – zero carbon buildings.
- Should differentiate between standards for commercial and residential properties.
- Current building regs do not achieve net zero and therefore we need a standard to do so.
- Consider cradle-to-grave embodied carbon as well as energy usage.
- Suggestion of Passivhaus standards - a ready-made and testable standard that could be used.
- An alternative approach is to adopt the Code for Sustainable Home Level 6, on all new developments from 2022.
- Suggestion of phasing new development so that to the greatest possible extent, any new homes will have to satisfy the Future Homes Standard.
- Design Guidance is required.
- New houses should have a negative DER to account for non-regulated emissions.
- New non-domestic buildings should have a TER of zero and be BREEAM Excellent. Ideally, they would achieve BREEAM Outstanding.
- The more the standards are raised the more likely it is that economies of scale will lead to lower prices e.g. for solar PV roof tiles etc.

Retrofitting

Town and Parish Councils

- Concerns with the cost of retrofitting buildings when legislation catches up with higher requirements.
- The policy should include specific reference to enhancements to existing buildings.
- Retrospective installations are costly to install, much better installed at the time of construction.

Environmental groups (non-statutory)

- Insulation and retrofitting of energy saving measures should be incentivised for businesses, homeowners, and landlords.

Local community groups (non-statutory)

- Need for a programme of retrofitting of existing houses in order to secure energy efficiency, lower heating costs, greater comfort and improved cooking facilities.
- Development plan may not traditionally focus on retrofit of older homes, but in terms of cutting carbon this is where our emphasis should lie, and the plan should point this out.

Public response

- Should be a strong commitment to retrofitting existing buildings in Dorset.
- Refurbishment of existing buildings shouldn't be subject to such stringent policy - shouldn't be so hard to re-develop what is already there.
- Need to make it more viable to restore existing buildings.
- Actions should include changes of internal layout, extensions, double-glazing of windows or installation of solar panels.
- The retrofit programme should also extend to business and industrial premises.

11.2. Policy

Policy approach

Town and Parish Councils

- Support for the approach.
- Disagreement with the approach.
- Definitions of 'high levels of environmental performance' should be specified.
- The policy needs to be specific and measurable.
- It is not clear from the Plan how energy saving can be addressed by the use of more efficient construction materials and the use of ground/air source heating systems.
- High standards of environmental performance need to be applied to all developments.
- Homes that will be marketed at above the average local property price should be held to the highest environmental standards.

Environment Agency

- Support for the inclusion of the policy.

Sport England

- Support for the policy.

Dorset Wildlife Trust

- Suggest the text and policy ENV9 is brought up to speed with the latest government announcements requiring change from 2021.

Local community groups (non-statutory)

- Agreement with the approach - subject to the ambition that the installation of suitable solar panels, or such other future energy efficient methods, should be presumed for all buildings.
- Policy is too narrow in scope and too vague.

Developers/Landowners/Agents

- Support for the premise of the policy.
- Objection to the current wording.
- The policy wording has no clarity or specificity – need to set out what constitutes a ‘high standard of environmental performance’.
- Currently the policy is not justified or effective as per the test of soundness as set out in paragraph 35 of the NPPF.
- Concern with the inability to monitor the policy.
- Policy should be based on proportionate evidence and standards should be within the policy.
- It would be beneficial to clarify that for some developments aspects of viability may impact the ability to deliver the highest levels of environmental performance.
- Clarity should be given within the policy whether any factors such as viability, wider benefits of the proposals, or other matters will be considered in assessing the environmental performance of a development.

Need for stronger wording

Town and Parish Councils

- Policy should be stronger with respect to achieving high standards of environmental performance (Beaminster Town Council).
- Policy appears weak whilst trying to encompass the text within paragraphs 3.10.1 to 3.10.8.
- Considers that the policy should be re-drafted substituting the word 'sought' with the words 'will be achieved' when referring to high standards of environmental performance.
- Opportunity should be taken to engage wording such as “will be expected”.
- Considers that all development should be subject to the requirement for 'high standards of environmental performance'.

Natural England

- Supports the need for high environmental standards, and suggests the policy wording is strengthened to “will achieve” rather than “expected to achieve”.

Local community groups (non-statutory)

- Suggest use of the words “will be expected”.
- The policy wording is much too brief and too generalised - should send a stronger signal about expectations from development.

Public response

- Policy is too vague - appears to be only for large developments.
- Policy is vague in relation to needing to address climate emergency.
- Change wording "are expected to achieve" to " must achieve".

- Concern with the wording “where possible” - an open goal for those who wish to get away with lesser quality.
- Concern with wording “will be sought” – suggest change to “will be insisted upon”.
- Respondent queries how the council will ensure that new buildings are energy efficient given national standards are inadequate in that they will not achieve net zero energy use?

Need for specific targets/standards

Town and Parish Councils

- Need for more ambitious/more effective requirements around sustainable construction and design.
- Concern that without setting specific standards the policy will have little impact.
- Policy requirements should be required before 2025.
- The statements in paragraphs 3.10.2 - 3.10.5 of the main document should be incorporated into the policy statement.
- Developers must ensure all avenues are explored to achieve carbon neutral figures.
- This policy needs to be more ambitious - specifying EV charging points for each house, PV panels with battery storage of surplus generation as an expectation.
- Standards such as Passivhaus and Build regs Section L should be identified and made mandatory.

Environment Agency

- Would be beneficial to include some specific targets or standards for developers to achieve in this policy document.

Dorset Catchment Partnership

- We suggest it would be appropriate to provide a specific reference within this policy to reducing water wastage and promoting water re-use in buildings.

Environmental groups (non-statutory)

- In order to address the climate and ecological emergency, tougher requirements will be required more quickly. At the very least we suggest the text and policy ENV9 is brought up to speed with the latest government announcements requiring change from 2021.
- Would be helpful if the policy provided guidance on what is expected even if it has to resort to simply referring to Future Homes Standard or to preceding paragraphs.
- Requirements for commercial and industrial buildings should also be identified.
- Should insist on high carbon-negative, environmental and social standards in all new housing, with local greenspace and facilities so people can make a good life without travel far from home.

Local community groups (non-statutory)

- Suggestion of alternative approach whereby development takes account of emissions associated with construction (and demolition) of a new building, its operation, and indirect emissions (i.e. from transport).

Developers/Landowners/Agents

- The policy may be unnecessary in view of new and emerging central government requirements, including 2025 Building Regulations.
- Any standards set by the policy will need to be tested as part of the Local Plan’s viability evidence.

- Should incorporate principles into the policy wording itself or deleted from the supporting text and added into the forthcoming design SPD.
- Concern with potential conflict with Building Regulations – need for consistency and a national standard that is universally understood and deliverable in practice.

Public response

- Paragraph 3.10.5 - should be mandated for all new buildings and must form part of the policy.
- The statements in paragraphs 3.10.2 to 3.10.5 should be contained within the policy statement.
- Clauses 2. & 3. need to be more robust.
- Add “and the imperative to reduce greenhouse gas emissions by 50% and 75% by 2030 and 2040 respectively and to net zero by 2050.”
- Suggested revision to the policy wording to include the need to implement the Energy Hierarchy, with fabric first, passive design and landscaping measures.
- Suggestion revision to the policy wording to include the need for an Energy and Climate Statement for major housing developments, to demonstrate a minimum 25% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013, or higher as required under new national requirements.

Criterion I.

Town and Parish Councils

- Clause I - suggest the following revision... “and must make a significant contribution to zero carbon emissions. All buildings should conform to the emerging Future Homes Standard.”.

12. Policy ENV10: Shop Fronts and Advertisements

12.1. Approach

Policy approach

Town and Parish Councils

- Support for the policy approach.
- Note the need for businesses to advertise in rural areas - suggests that balanced decisions will need to be taken.
- Suggestion that stronger cross referencing with the more detailed policy HT3 on Shopfront Design in the Bridport Area Neighbourhood Plan Policy HT3 would better inform developers of requirements.
- Considering the effects of the impact of internet shopping on the retail sector, and most recently the impacts of Covid and Lockdown it is anticipated that more applications for change of use from retail to residential will be submitted.
- A policy for the change of use of retail premises to residential in Town Centres to ensure that such conversions are carried out in a way that is sympathetic to the street scene and environmentally friendly and economical for the future occupants should be created.

Bridport Local Area Partnership (BLAP)

- The policy could refer to the policy and substantive guidance which appears on this topic within the BANP neighbourhood plan.

Weymouth Civic Society

- Support for the safeguards in the section - particularly in respect of Weymouth Town Centre.
- A robust policy is needed.
- Impacts of unsuitable shopfronts and advertisements on the appearance of buildings and areas.
- Cumulative detrimental impacts of unsuitable shopfronts and advertisements on the whole character of historic town centres.

Blandford & District Civic Society

- Will there still be specific shop front guides for example like that which existed for the Georgian Blandford town centre?

Public response

- Agreement with the policy approach.
- This policy ENV10 should include the design of signage and their impact on surroundings.
- With the current financial and retail challenges it is important that these areas are made more attractive and resilient.
- Concerns with light pollution and energy consumption of car park lighting - suggestion of a curfew.
- Any refurbishment should take the opportunity to improve the thermal efficiency of the building (as recorded in the EPC).
- Importance of considering the overall building fabric of towns - investment for the future.
- Concerns with curb sizes.
- Suggestion that upper floors of buildings should be part of the design so that current state of disrepair/rot of upper floors and roofs is halted.
- Respondent suggests that a post-Covid review should look at future retail and work arrangements to allow for greater housing provision in town centres and on office/brownfield sites, especially in Dorchester.

Paragraphs 3.11.2-3 - Design of shop fronts

East Dorset Environmental Partnership

- Paragraphs 3.11.2 - 3.11.3 - Given the climate change and ecological emergency and damage caused to man and the natural environment by light pollution, consideration should be given to refusing planning consent for illuminated signs.

Town and Parish Councils

- Planning conditions should be used to ensure shop fronts remain tidy and attractive if vacant.
- There should be emphasis on sign and shop front design being in keeping with its surroundings.

Public response

- Regulations should ensure shop front are not illuminated after a certain time.
- All lighting must be LED as standard.
- Concerns with garishness of national chains.
- Concerns with light pollution and energy consumption of window displays.
- Advertising size and lighting should not have a negative impact on neighbouring residences.
- Policy seems confined to shops in the streets - suggest expansion to cover supermarkets, particularly about lighting.

- Council should introduce requirement to restrict/limit illuminated signs on the grounds that they are unsustainable (leading to carbon dioxide emissions through energy consumption).

Paragraph 3.11.4 - Security shutters or grilles

Town and Parish Councils

- Paragraph 3.11.4 - Arguably, a glass frontage would make it more secure anyway.

Paragraph 3.11.5 - Advertisements

Cranborne Chase AONB Team

- Concern with a variety of roadside advertising signs that do not conserve or enhance the AONB – paragraph 3.11.5 and policy ENV10 should be reinforced to cover such issues.

East Dorset Environmental Partnership

- Free standing advertisements placed on pavements can be a hazard and reduce available space for pedestrians. The need for social distancing makes matters worse.

12.2. Policy

Criterion I

Historic England

- Update 3.11.1 and ENV10 criteria I - to seek the retention of historic shop fronts and advertisements that make positive contributions to the significance of heritage assets and/or to the character and appearance of streetscapes and townscapes.

Criterion II

East Dorset Environmental Partnership

- Policy ENV10, criteria ii - Amend to read: “Decisions controlling advertisements will be made in the interests of amenity, public safety and biodiversity”

Town and Parish Councils

- ENV10, criterion II should be strengthened to be more explicit about advertisements of highway verges - can sometimes lead to distraction of drivers of vehicles.

13. Policy ENV11: Amenity

13.1. Approach

Policy Approach

Town and Parish Councils

- General support for the policy approach.
- Policy reflects national policy and policies of the Bridport Area Neighbourhood Plan.
- Support for protecting the amenity of existing and future residents.
- The process of engaging with Town and Parish Councils should be strengthened.

Historic England

- ENV11 and supporting text should recognise that noise, vibration, odour, and light intrusion can have negative impacts on the settings and significance of heritage assets.

Natural England

- Supports the need to maintain tranquillity within the AONB.

Dorset AONB team

- The policy is supported.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Agreement with approach - important to residents.

Public response

- General support for the policy approach.

Paragraph 3.12.1

Town and Parish Councils

- Paragraph 3.12.1 third line 'sunlight5' should read 'sunlight', the footnote reference is not properly formatted.
- Paragraph 3.12.1 and footnote - the issue of a right to a view should also be noted.

Paragraphs 3.12.3-6 - Design

Blandford Town Council

- Paragraph 3.12.5 - Agree. This is the kind of hard line that should be taken with regards sustainable building and climate change.

Public response

- There should be greater separation between housing developments to increase well-being and avoid the feeling of being in the middle of a huge urban sprawl, especially in rural areas and small towns.
- Consider housing density, plot size and the space between homes as these all contribute to the health and welfare of those living in new developments.
- Paragraph 3.12.5 and 3.12.6 The word "should" be changed to "must" because the word should is only advisory and it is vitally important that Policy ENV11 Amenity is not diluted by developers.

Paragraphs 3.12.7-11 - Noise

Natural England

- Endorsement of paragraph 3.12.11

Town and Parish Councils

- Paragraph 3.12.10 – Agreed. Should refuse on grounds of unnecessary environmental impacts too.

Dorset AONB

- Reference to the potential detrimental effect of noise pollution on the AONBs is welcomed.

Public response

- Paragraph 3.12.7 - Need to define a significant noise impact. Control of noise and time of noise is a very big issue to public health. No night-time increase in noise should be allowed.
- Paragraph 3.12.7 fails completely to understand the issue of noise nuisance. It is obvious that patrons leaving a pub at 1.30am will cause more disturbance than if they left at 11pm, but the noise level may not be significantly higher.
- Paragraphs 3.12.7 and 3.12.9 makes an important point but is not acknowledged explicitly in policy.

Noise - Bournemouth International Airport

Bournemouth International Airport

- Concern in circumstances where the DCLP makes no reference to the numerous proposed site allocations being under flight paths associated with Bournemouth Airport. E.g. WMC3, WMC4, WMC5, WMC7, WMC8, WMC9, CORM2, CORM3, CORM4, CORM5, FERN3, FERN4, FERN5, FERN6, FERN7, WMO1, STMR2, STMR3 and STMR4 are affected by arrival and / or departure corridors. Moreover, the proposed FERN allocations are located a short distance off the western end of the runway within or close to the relevant aircraft noise contours.
- Concern with proposed allocations near airports, applicants need to understand issues associated.
- Suggestion of additional policy criterion in relation to the need for design or other appropriate measures if required to mitigate potential noise impact from the flight paths associated with Bournemouth Airport (see full comments for suggested text).
- Many of the proposed site allocations are also located within areas covered by the Bournemouth Airport safeguarding map where consultation may be required. This should be recognised by the DCLP, either through a further criterion added to Policy ENV11 or a new freestanding policy (see full comments for suggested additional text).

Noise - Rail network

Network Rail

- Noise issues from roads and railways - It should be noted that on the SWML most services are operated by electric trains with only the Cross-Country services, freight or charter trains being operated with diesel traction. On the Heart of Wessex line, the services are currently operated by diesels, but this may change because of TDNS. There are suggestions that the West of England line may be electrified as part of TDNS.

Noise impact assessments

Town and Parish Councils

- There is no mention of the use of noise impact assessments.

Paragraph 3.12.12 - Unpleasant odours and emissions

Town and Parish Councils

- With reference to unpleasant odours, whilst the sewerage treatment zones buffer is shown on the policies map, it would also make sense to highlight other known sources of noise and pollution (potentially linked to unrestricted B2 and waste processing uses).

Wessex Water

- Policy approach should be expanded to include flies. Section 101 of Clean Neighbourhoods Protection Act 2005 added to the description of statutory nuisances listed in section 79(1) of the Environmental Protection Act 1990.
- Within the supportive text the sections on noise and odour should be amended and expanded to clarify that where development is proposed in proximity to existing noise/odour sources (and vibration and flies) the onus will be on the applicant to demonstrate that the proposed use will not impact on the existing lawful use, consistent with the approach identified in the NPPF (paragraph 182 of the NPPF). Suggested wording supplied.

Beach pollution

Public response

- Respondent considers that the local plan should include a policy requirement for all new development too include appropriate infrastructure to ensure that beaches in Dorset are clean and do not become polluted.

Paragraphs 3.12.13-15 - Artificial lighting

Town and Parish Councils

- Concern with impacts of external lighting on the night sky - would like clause 3.12.14 of the Local Plan to be strengthened (see full comments for suggested wording).
- Seeking to control intrusion from artificial lighting schemes is welcomed.
- Policy should be more strongly worded in the form of a Dark Skies policy.
- Scant attention is paid to the impact of development in dark, quiet back land areas of the settlement such as flood plains and woodland where wildlife is active and roam freely.
- Endorsement of paragraph 3.12.13.

East Dorset Environment Partnership

- Light and air pollution are covered under Ground conditions and pollution in NPPF (paras. 178-183) - appears to be no logical reason to include lighting under Amenity in the Plan: it is important that users of the Plan can find topics easily and where they expect them to be.
- Because Light Pollution is so damaging, it is suggested that if it is to remain under Amenity it should at least be cross referenced to each of Biodiversity, Landscape and Pollution.
- Paragraph 3.12.13 – 3.12.14 - description fails to explain what light pollution is, the damaging effect of artificial light on all living organisms including man (not just bats!) and the disruption to ecosystems.
- Approach fails to consider or reflect NPPF Guidance. It is incorrect and very misleading to mention only glare – requires redrafting.
- The Institution of Lighting Professionals (ILP) recommends that LPAs specify environmental zones for exterior lighting control within Plans – see full comments for details.
- Recommend reference to NPPF guidance on light pollution, Royal Commission on Environmental Pollution (2009) Artificial Light in the Environment, and Bat Conservation Trust Guidelines on Bats and Artificial Lighting (2018).
- Paragraph 3.12.15 Amend to read: “... Policy ENV3: Biodiversity and net gain and Policy ENV4: Landscape will apply”
- Consideration should be given to refusing planning consent for illuminated signs - time it is switched on should be restricted and the light directed at only those areas which are intended to

be illuminated - assessment of the benefits and adverse impact must include impacts on ecosystems as well as protected and priority species, man, and landscapes.

Public response

- The policy does not specifically mention agricultural development which has become industrialised in recent years. This development can give rise to 24-hour lighting in rural areas which are otherwise 'dark skies'.
- An external lighting curfew would be desirable.
- Include hours of operation as well as specification for lighting schemes.

Sport pitch lighting

Sport England

- For planning applications involving sports lighting we would recommend encouraging pre-applications by the applicants in conjunction with Sport England to ensure the correct illuminance is achieved with the correct switchgear and fittings to avoid overuse and misuse of sports lighting and energy.

Town and Parish Councils

- Unclear in this policy whether adequate protection from loss of amenity is considered for the determination of floodlit external sports facilities which can often had significant impact on noise and light for neighbouring properties.

Artificial Lighting SPD

East Dorset Environment Partnership

- Recommend an SPD on Artificial Lighting is produced to better inform site selection and development criteria and to provide guidance to homeowners and developers, and that assessment of the suitability of a site should include details of changes in artificial illumination of the whole area (not just the development site) itself.

Light intensity assessments

Town and Parish Councils

- There is no mention of the use of light intensity assessments.

Dark Skies

Natural England

- Recommends this section is expanded to include reference to the Cranborne Chase International Dark Sky Reserve and the need to adopt minimum dark sky compliant lighting standards.

Dorset AONB

- It is suggested that the text of the Plan be modified to include a similar reference to the AONBs' dark skies in relation to light pollution.

Cranborne Chase AONB Team

- Recommends that it would be more appropriate to consider environmental lighting zones as set out by the Institution of Lighting Professionals 2011 as guidance for lighting various areas ranging from major towns to the International Dark Sky Reserve.

- Lighting should not cause light intrusion, skyglow, or a nuisance, be downward directed, of an appropriate colour corrected temperature (usually 3000 Kelvin or less), and with timing, motion sensitive, and dimming regimes to save energy and minimise disturbance to natural circadian rhythms.
- The lighting zones provide criteria for more or less populated areas – reference to information on good, dark sky compliant, lighting on the AONB website.
- In the sensitive areas of the International Dark Sky Reserve and the Dorset AONB permitted development rights for lighting should be removed to ensure that only Dark Sky compliant lighting is fitted in future.
- Strongly advises that, looking forward over the time period of this Local Plan, there is a separate section on lighting as this is going to be an increasingly sensitive issue. Reference to potential lighting policies set out in Annex C.

13.2. Policy

Criterion I.

Natural England

- Recommends that the need to protect the amenity value of greenspaces is incorporated into the policy. This might be achieved by adding “or local greenspaces” to the end of the third bullet.

Lichfields on behalf of Bourne Leisure

- Concern that the policy gives leeway for applicants to bring forward proposals that have adverse impacts and are only required to minimise impacts rather than to mitigate impacts.
- Policy ENV11, criteria I. - concern with focus on residential amenity - should also provide adequate amenity protection for visitor accommodation, camping and caravan sites - noise impacts can affect visitor numbers.

Public response

- Policy ENV11, criteria I. - do not agree with the inclusion of the term flicker as it will serve only one purpose, to object to any application regarding wind farms. I believe that there are other avenues for legitimate objections available.
- Significant increase in noise levels is not the same as the detrimental effect of noise at different times of the day. The word 'significantly' should be removed from the policy.
- Need to define what is meant by significantly adverse effect as subject to interpretation as subjective.

Criterion II.

Town and Parish Councils

- Policy ENV11.II specifically mentions ‘the amenity of future occupants’. The policy should apply to all occupants, current and future.

Criterion III.

Public response

- Criterion III. of the policy should be extended so that AONB policies on lights are clearly followed, if in an AONB.

- Query how will ENV11, criterion III work when the lighting nuisance is coming from a neighbouring local authority?

14. Policy ENV12: Pollution control

14.1. Approach

Paragraph 3.13.1 - Pollution

Town and Parish Councils

- Incineration of waste should be opposed.
- Highlight the need for 'better use' of licensing and laws relating to pollution control.
- Importance of implementing the objectives contained in the Dorset Heathland Air Quality report.
- Need to effectively deal with pollution problems.
- A lot more than green infrastructure and building design are required to mitigate pollution. For example, how can a 55% reduction in traffic on the roads be achieved.
- Green infrastructure must include Green Walls and Wall Planting in areas where there is little space for direct planting.

Historic England

- Paragraph 3.13.1 to include the historic environment and the setting of heritage assets.

Environmental groups (non-statutory)

- Section 3.13 should refer to ground condition and pollution as in the NPPF, not to pollution and contaminated land.
- The section deals with chemical pollution but noise and light pollution are covered under amenity - concerned about this departure from the "norm": it is important that anyone wanting information on each topic knows where to look.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Dorset Council needs to take a lead by better using the legislation and licensing laws it has available to it. Dog fouling, fly tipping etc. are also forms of pollution but we are unsure how this could be written into planning guidance.

Public response

- The local plan should include a policy requirement for all new development too include appropriate infrastructure to ensure that beaches in Dorset are clean and do not become polluted.
- Suggested addition of timescales and dates.

Paragraph 3.13.2 - Air quality

Town and Parish Councils

- Importance of implementing the objectives contained in the Dorset Heathland Air Quality report.
- Poor air quality represents serious harms to human health and biodiversity.

- Air quality in rural areas is not necessarily less polluted, although pollutants may be different - need to review this as potentially based on a false assumption.
- A lot more than green infrastructure and building design are required to mitigate pollution. For example, how can a 55% reduction in traffic on the roads be achieved.

Public response

- Support for the inclusion of air quality management areas.
- More up to date data is needed to allow more informed policies on tackling local air quality hotspots and help improve people's health.
- Provision of cycle lanes & encouraging the use of buses will not alleviate these problems, as it is unlikely people will travel to work via bike as most employment premises will not have showers.
- Air pollution can only be controlled with an effective public transport system and suitable safe pedestrian and cycle routes.
- Concerns with levels of housing development - numbers proposed will lead to increases in air pollution through the construction process, traffic movement, the homes themselves, occupants and additional transport requirements.
- Infrastructure is needed to reduce the traffic pollution from proposed new developments – this doesn't seem to have been considered.
- Need Clean Air Zones and more green spaces established to promote wellbeing which in turn helps the economy and community.

Paragraph 3.13.2 - Area-specific air quality issues, and Air quality management areas (AQMAs)

Town and Parish Councils

- Concern with Air Quality through Chideock - as nothing has been achieved to alleviate the pollution, it now has the highest NO2 levels in the country.

Public response

- The plan must accept that where there are legally exceeded levels of NO2 an AQMA (Air Quality Management Area) will be declared (eg East Street, Bridport).
- There is an air quality issue in West Road into West Allington, neat the Bridport Medical Centre. - no air quality management area has been declared.
- Issues with pollution in Bridport and having tables on pavements in town centres when there are high levels of pollution in the town centre.
- A full air quality survey should be undertaken for Vearse Farm, Bridport.
- Air quality data reported in the Sustainability appraisal scoping report Nov 2019 is out of date and does not reflect the current traffic levels and pollution - particularly in Wimborne - existing congestion issues (report dated 2016).
- Concerned about traffic pollution (dioxide and particulates) increasing with new development in Dorchester.

Paragraph 3.13.3 - Groundwater pollution, river pollution, and sewage

Town and Parish Councils

- Lack of reference to high phosphate levels and the potential eutrophication of rivers, eg. Avon in Hampshire.

- Concerns that aquifers are not considered - usually provide a high level of water storage, queries how development will impact on water supplies and river levels on a strategic scale.
- Problems with sewer inundation and infiltration consultation zones should be specifically referenced in the plan and shown as a constraint on the policies map.

Environment Agency

- Strategic developments should take place in locations that will result in low pollution - ideally be outside Source Protection Zones, where any deterioration in water quality may result in the need for further water treatment of drinking water supplies.
- Where development within SPZ 1 or a Safeguard Zone, cannot be avoided, a hydrogeological risk assessment should be undertaken in accordance with government guidance, to determine the impact the development will have on surface and groundwater quantity and quality.
- Where any impacts are identified the HRA should identify if these can be mitigated, and agreed with the EA and any such measures should be included as a planning condition as part of the development.

Dorset Catchment Partnerships

- Proposals for development must comply with the 'no deterioration' requirement of the Water Framework Directive (or it's UK replacement).
- Additional wording should recognise the Catchment-Based Approaches already in place.

Environmental groups (non-statutory)

- The policy should recognise water as a life-giving resource for all the county's habitats and that rivers are an important resource and habitat in their own right. This will help to avoid harm to water quality and river condition from development.

Portland and Poole CPRE

- The enhanced risk of increased water pollution (Poole Harbour) associated with new dwellings in the wrong place requires clarification about how any such risk will be removed and making the situation worse.

Developers/Landowners/Agents

- The North Dorchester site (DOR13) has the potential to provide nutrient 'credits' that could be used to support other sites in the Plan.

Public response

- Combined Sewer Overflows (CSO's) must not be allowed - they can discharge raw sewage into rivers, some of which are used for bathing and paddling.
- Sewerage system is not in a good state of repair in The South Winterborne valley and needs repair and overhaul - further development in the valley should not happen unless raw sewage can be dealt with.
- Concern with the discharge of raw sewage, which comes out of the sewer at the time of flooding.
- The water quality of river catchments in Dorset and the Dorset AONBs needs to be improved to halt the declining populations of freshwater fish and other riverine organisms.
- River water quality is largely failing to meet chemical/ecological standards - policy needs to show how the actions of the Council and others, principally the Environment Agency, is going to address these issues.
- The Plan should value chalk streams in a higher order.

- Importance of safeguarding and stewardship of the Frome and the Piddle - these rivers should be given special recognition in the plan.
- Section 3 fails to address the Frome and Piddle rivers that were classified as “Poor” and “needing improvement” in 2004 by English Nature/Environment Agency - no improvement since - polluting impact of run off from intensive farming - organic fields sheep pastures and water meadows surrounding the R Frome at Wool are an exception to this - but allocated for development in the plan.
- Intensive farming generates nitrogen, pesticides, phosphates and silt which are the main pollutants that the Frome, Piddle and tributaries transport into Poole Harbour.
- Nitrates issues resulting from new development are addressed in the plan - but need to address issues resulting from intensive farming.

Paragraphs 3.13.4 - 3.13.5 - Contaminated land

Historic England

- Paragraph 3.13.4 to acknowledge the potential presence of heritage assets, in particular archaeology and provide a link to our guidance.

Thornhackett Parish Council

- Paragraph 3.13.4. Should exemplars of potentially polluted sites include disused petrol filling stations and motor repair or breaking premises?

Historic England

- With a national drive to redevelop brownfield land planners and developers are increasingly faced with sites that may have been contaminated through previous industrial, commercial or agricultural use.

14.2. Policy

Policy approach

Town and Parish Councils

- General support for the policy and approach.
- Some suggestion that the approach should be more ambitious.
- Need to effectively deal with pollution problems in the plan - simply putting aspirational words into Planning Guidance is not going to solve anything.

Environment Agency

- Support the inclusion of the Pollution Control and Contaminated Land section and associated policy.

Historic England

- Historic England supports the intent of this policy as pollution can adversely affect the significance of heritage assets, including their settings.
- Policy ENV12 to include mention of the historic environment, e.g. ‘Development proposals which will cause unacceptable on or off-site risk or harm to human health, the natural and historic environment or living conditions, either individually or cumulatively, will not be permitted....’.

Public response

- The policy should be stronger.

Criterion I.

Natural England

- Policy ENV12 Clause 1 - tests for impacts on National Site Network should be amended to “must be avoided, satisfactorily mitigated and if of imperative reasons of overriding public interest, compensated in accordance with policy ENV2”.

Criteria III. and IV.

Public response

- Query use of wording 'where appropriate' - a questionable phrase.

Additional criteria

Amphibian and Reptile Conservation

- Policy ENV12 should include a section on light and noise pollution and its impact on biodiversity.

Historic England

- Policy ENV12 and supporting text should seek the identification of archaeological remains early on within a contaminated site, as this is an important step in understanding how archaeology can influence remediation strategies and affect construction timescales.

14.3. Other issues

Monitoring, enforcement and assessment processes

Town and Parish Councils

- Dorset Council can make vigorous use of Section 106 agreements, Community Infrastructure levies and Nitrate Sensitive Area levies to make sure developers are held to the highest standards.

Public response

- Monitoring and reporting of data is needed to determine if the implementation of policy is having the intended outcomes.
- Environmental Health do not have the expert knowledge or equipment to regulate residential activities that cause unacceptable risk to human health and living conditions - concerns in relation to performance of policy ENV12
- Need to recognise ecocide as a crime.

Area specific issues

Public response

- Concern that proposed housing at Lytchett Matravers is contrary to the policy.
- It is hoped that Bridport is not to become a destination for waste of all types drawn from other parts of Britain.

- Concerns with waste incinerator proposal on Portland and compliance with policy ENV12, will not help us meet the reductions in greenhouse gas emissions and in air pollution that the Council has pledged to address in its Climate and Ecological Emergency Strategy.

Waste and recycling

Town and Parish Councils

- Support for incentives to reduce waste and increase recycling.

Public response

- Lack of reference to litter/plastic pollution - need to address such matters.
- Need more policies to reduce unnecessary consumption and ensure less waste.
- Incineration plants are the next most polluting form of energy production after coal.

15. Policy ENV13: Flood Risk

15.1. Approach

Introduction

Environment Agency

- We recommend removing the text “areas subject to flooding” as flood extents will increase.

Paragraph 3.14.2 - River catchments

Environment Agency

- We recommend including the River Wey in the list of rivers.
- We recommend noting in the plan that rivers and catchments in West Dorset respond rapidly to rainfall and surface water bringing increased flood risks.

Dorset Catchment Partnerships

- We suggest the river Corfe is included as the major river catchment of Purbeck.

East Dorset Environment Partnership

- Add the catchment of the “Hampshire Avon SAC includes parts of East Dorset”.

Dorset Action

- River Stour is under great stress.

Town and Parish Councils

- Concern with flooding and collapse of the Asker.
- Support policy and highlight flood risk as a serious issue for the Bradpole Parish Council area.
- Parts of Stourpaine are susceptible to fluvial, groundwater and surface water flooding.

Public response

- Land around Bridport and West Bay (including Meadowlands and Verse Farm) is at risk from flooding.
- Would like to see the provision to prevent any development in river valleys, on flood plains and food producing land including allotments.

Paragraph 3.14.3 - Coastal flood risk

Symondsburry Parish Council & Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- The Symondsburry and Bridport area also encompasses a section of the Jurassic Coast, predominantly around West Bay, where the coastal flood risk is recognised.

Portland Town Council

- There is no specific reference to protecting Portland Beach Road and Ferry Bridge from flooding, although Chiswell is recognised. This was very specific in the previous plan. Dorset Council seemed slow to react to a recent breach at Chiswell, highlighting the need to maintain defences at Portland.
- Consideration of use of natural flood defences which would also support carbon sequestration

Dorset Action

- Flooding by inundation of the sea with growing dangers of continuous sea level rise and more powerful storms

ADVEARSE

- Flood risk is a serious concern for many areas in Dorset, particularly those close to the coast.

Public response

- Significant flood risk in Swanage.

Paragraph 3.14.4 - Ground water

Environment Agency

- Groundwater flooding from the upper greensands and from the chalk are very different mechanisms. Revised wording suggested.

West Moors Parish Council

- The water table has risen in many areas including West Moors and there is flooding where there did not used to be - could be a result of climate change, but it needs to be considered

Milborne St Andrew

- In Milborne St Andrew a key issue has been groundwater levels and sewer inundation. The approach of pumping out the sewerage system from below March Bridge In times of sustained wet weather is not a sustainable, long-term solution.
- Reference to issues such as this should be made in the Local Plan to raise awareness, and the areas subject to such special measures should be specifically shown on the Policies Map.

Motcombe Parish Council

- Areas like Motcombe at risk from groundwater flooding should be referred to and shown on the Policies Map.

Paragraph 3.14.5 - Surface water

Environment Agency

- We recommend this paragraph includes that surface water flooding can also take place due to the intensity of the rainfall (i.e. The ground cannot begin to soak in the water under any conditions if the rainfall is intense enough).

- This paragraph should include climate change, and how this will change not only the rainfall intensity, but also the ground conditions (e.g. dryer summers and wetter winters are likely to increase runoff rates).

Forestry Commission

- List should include compacted agricultural ground

Forestry England

- Need to consider hydrological processes to avoid pollution and conserve soil structure.

The Erica Trust

- Concern with impacts of development in resulting in quicker surface water run off – the role of eco system services in prevention of flash flooding;
- Concern with flash flooding and ability of SUDs to mitigate this.

Holwell Parish Council

- Reference to Wessex Water work in Holwell to investigate sewer capacity and surface water issues in the area – need to refer to such issues in the Local Plan to raise awareness, and areas subject to such special measure should be specifically shown on the Policies Map.

Chideock Parish Council

- The plan fails to mention a cause of flooding is from poor farming practice such as poor maintenance of field drains and ploughing with contours rather than diagonally across contours to minimise risk of surface water run-off

Public response

- Cumulative impacts local surface water infrastructure considered and addressed, all new development must reduce flood risk.
- Council does not enforce existing law/requirements around drainage and lack of enforcement of law/requirements increases to surface water flood risks.

Paragraph 3.14.7

Dorset Catchment Partnerships

- Flood risk assessments should include detailed assessments of the local geology, which may be complex with features such as patches of impermeable clays and wet flushes affecting proposals for sustainable drainage.

Dorset CPRE

- Development should never be permitted on Flood Zone 3 (1 in 100 years), given it is generally accepted new buildings will last for at least 60 years.

Paragraph 3.14.8 - Assessing flood risk

Environment Agency

- This also needs to note the need for an SFRA Level 2 in high-risk locations.

Dorset CPRE

- Section should reference that Dorset Council is the Lead Local Flood Authority (LLFA).
- Dorset Council is represented on the Wessex Regional Coastal Committee (which sets a Local Levy to fund flood alleviation measures).

East Dorset Environment Partnership

- Disappointing that an updated Level 1 SFRA has not yet been prepared.
- Existing published SFRA for East Dorset area are not up to date
- No reference to the Stour Catchment Management Plan or Moors River restoration proposals

ADVEARSE

- Lack of focus on reducing flood risk via Strategic Flood Risk Assessment and avoiding building houses in areas that will increasingly as a result of climate change be at risk of flooding.
- Section 3.14.8 should be updated to reflect the need for both levels of SFRA to be completed and also for related planning decisions to be put on hold until they can be properly assessed for flood risk.
- SFRA need to be maintained on an annual basis as the increasing risk from climate change becomes clear over future years.
- Where developments have already been consented in flood risk areas Dorset Council must not add more housing onto these developments and must require house builders to build fully future proofed flood defences based on up-to-date water table and flood risk surveys.

Dorset Action

- Strategic flood-risk assessment (2008) Evidence out of date.
- Flood-prone land should not be built on.
- Need to be looking forward at least 20 years and starting to work now on those predictions

Public response

- Council's policy may need to be updated to reflect the latest evidence.
- Lack of strategic SFRA.
- Note that flood risk mapping not always accurate.
- Assessment of risk should take account of climate change.

Paragraph 3.14.9 - Assessing flood risk

Environment Agency

- Another paragraph needs to be added in relation to the Risk of Flooding from Surface Water maps available from the Environment Agency and the information that they show. It should also refer to the fact that Wessex Water hold flood risk information that should be used in the Strategic Flood Risk Assessment.

Cranborne and Edmondsham Parish Council

- Flood risk mapping is often desk-based and cannot always reflect levels and reality on the ground.

Paragraph 3.14.10 - Assessing flood risk

Environment Agency

- Please note that a number of new models have been completed within the past year. These include but are not limited to: Lower Stour, River Crane, Moors River, River Allen and rivers in Swanage and Bridport.

Dorset CPRE

- The Plan should reference that major applications should consult with the lead local flood authority and usually submit a drainage strategy to demonstrate that the sustainable management of surface water runoff will be required.

ADVEARSE

- Importance of independency of consultants on flooding issues, and accuracy of results.

Paragraph 3.14.12 - Avoiding Flood Risk

Environment Agency, Dorset CPRE & Puddletown Area Parish Council

- We believe it should read “engage” rather than “engagement”

Dorset CPRE

- Rephrase to read “a development will not flood over its lifetime”

Puddletown Area Parish Council

- There should be absolutely no “engagement” with the Council if the land is in a flood risk zone.

Figure 3.6 Parameters for undertaking the sequential test site search

Puddletown Area Parish Council

- It is not acceptable to create conditions where affordable housing is more acceptable in flood risk areas. Incentives should be used instead to encourage development of brownfield sites to meet the housing need.

Clemdell Limited

- Figure 3.6 Dwelling houses (Use Class C3) should limit the search area to the settlement that the proposal is serving, not least because different settlements have different policy parameters.
- The NPPF should be read as a whole, and the sequential test should not be the sole determinative of appropriate development.

Paragraph 3.14.14 - Avoiding Flood Risk

ADVEARSE

- Words should be included to ensure that possible alternative sites are properly evidenced with applicants providing a written assessments and the council requesting the public and landowners to make submissions on this.

Paragraph 3.14.16 - Avoiding Flood Risk

Wool Flora and Fauna

- Should ensure avoidance of all sources of flooding.

Puddletown Area Parish Council

- There must be no “exceptions” to the case for not placing new development in flood risk zones.

Paragraph 3.14.17 - Managing and mitigating residual flood risk

Puddletown Area Parish Council

- We consider that the section relating to managing and mitigating residual flood risk should be deleted.

ADVEARSE

- Section needs to be strengthened; requirements should be mandatory.

Paragraph 3.14.18 - Managing and mitigating residual flood risk -

Symondsburry Parish Council

- The plan should adopt an innovative approach to managing and mitigating the risks from flooding (taking particular account of extreme events).
- This should include supporting farmers and landowners in mitigating flooding issues upstream of the flood areas

Blandford Forum Town Council

- Policy does not mention tree planting on new development which can mitigate flood risk as well as providing carbon sequestration and shading.

Dorset Action

- River flooding, such as of the Somerset Levels ten years ago, is best managed in the higher reaches with 'leaky' dams and trees to absorb carbon dioxide.
- Beavers on the Isle of Purbeck (good) but 'flood meadows' are often historic.
- Planting trees on them is not always the answer.

Wool Flora and Fauna

- Proposals to support new flood management schemes are laudable but will not be implemented in time to resolve issues around proposed houses in this local plan.
- Should be avoiding flooding, not mitigating.

Public response

- Give more notice to water meadows as a means of alleviating river flooding, avoid development on water meadows and avoid too much hardstanding new development (to reduce rates of surface water runoff).
- Council should explore natural solutions to reduce flood risk.
- New development should be designed to minimise runoff (retaining trees/vegetation and limiting hard surfaced areas).
- Council should consider stricter controls to prevent loss of existing green spaces.
- Do not support re-introduction of beavers because of damage to vegetation, damage to farmland and safety risks arising from falling trees on roads/footpaths.

Paragraph 3.14.19 - Managing and mitigating residual flood risk

Environment Agency

- Revise the 8m distance from existing Flood Risk Management assets to 11m in order to safeguard land for future raising and maintenance in line with climate change.

Dorset CPRE

- The supporting text should reference development not being permitted within an 8-metre buffer zone of a main river as stated in Policy ENV13.

Paragraph 3.14.20 - Managing and mitigating residual flood risk

Wool Flora and Fauna

- The council will need large-scale sites and time in order to support new flood management schemes such as river restoration, wetland creation and tree-planting.

Forestry Commission

- A strong link should be made between the biodiversity net gain and flood management measures described here, thus ensuring the maximum natural capital benefits are accrued. To separate these misses a huge opportunity

Historic England

- Proposals for river restoration, wetland creation and tree planting for natural flood management and storage can also affect the historic environment. We consider that proportionate heritage impact assessments should be undertaken for all potential sites to identify affected heritage assets and their settings, and to consider how alternative options could first avoid, then minimise and mitigate any negative impacts on their significance.
- There may also be opportunities for new habitats to be created that would also enhance the significance of heritage assets and their settings.
- With tree planting, care needs to be taken in the choice of places, species and sizes to avoid and/or minimise any negative impacts on the significance of heritage assets, either directly or indirectly
- In planning new tree and hedgerow planting, there may also be important opportunities to gather valuable archaeological and palaeoecological information

15.2. Policy

Policy approach

Development industry

- Agree with approach.

Historic England

- The supporting text and the policy itself has not considered the many ways in which they interact – positively and negatively - with the historic environment.

Alderholt Parish Council & Fotnmell Magna Parish Council

- Agree with approach.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Approach - serious issue in the BANP area, and the wider local area, where there is a need to have regard to the effects of the entire catchment area of the water sources.
- Surface water run/off and pollution problems from surrounding hills recently witnessed.

Criterion I.

Environment Agency

- We would recommend the word “development” should be clarified.

Dorset Catchment Partnerships

- Development should not be located in areas which have been identified as sites for natural flood management to protect downstream infrastructure and communities.

Loders Parish Council

- Should specify that the implications upstream and downstream of incremental development are relevant considerations
- Should specify that the effect of surfacing areas, gardens and fields are also relevant considerations

Town and Parish Councils

- The policy should reference “all potential sources of flood risk”.

Public response

- NPPF requirement for sequential risk-based approach to the location of development - not addressed in the plan.

Criterion II.

Dorset CPRE

- Rephrase to read “a development will not flood over its lifetime”

Historic England

- While we note the intent of directing development to areas of the lowest flood risk, we would like the exception test to enable the impacts on heritage assets, and in particular heritage at risk to be taken into account.

Puddletown Area Parish Council

- Criterion II should be deleted and substituted with a statement to confirm that development will not be permitted on land at risk from flooding

Public response

- Welcome reference to potential to increase flood risk elsewhere.
- Considers that adjacent owners should be compensated if flood risks increase following development.
- Development should not be permitted where the development would cause or increase the risk of flooding in adjacent or nearby areas.

Criterion III.

Wessex Water

- The policy identifies that where opportunities exist development should deliver a reduction in flood risk.
- Would welcome policy which supported a reduction in connections between surface water and foul/combined sewers.
- Brownfield re-development provides an opportunity for 'surface water' separation which can address existing flood risk issues/free up capacity in the sewer network.

Public response

- Suggested change to drafting of paragraph III which should say 'developments must deliver a reduction' rather than 'developments should deliver a reduction'.

Criterion IV.

Environment Agency

- Expand on ENV13. Criterion IV. The design of a development site should account for exceedance events and design in such a way as to minimise any residual flood risk.

Puddletown Area Parish Council

- Criterion IV should be deleted and substituted with a statement to confirm that development will not be permitted on land at risk from flooding

Criterion V.

Historic England

- Where the relocation of development and infrastructure should also consider the implications for 'at risk' heritage assets as well as the impacts on the significance and settings of any heritage assets that may be affected in the development's new location.

Sport England

- We do not support the relocation or new playing fields on flood plains despite the this being an acceptable use by the Environment Agency due to the ongoing liability faced by sports clubs.

Criterion VI.

Environment Agency

- Revise the 8m distance from existing Flood Risk Management assets to 11m in order to safeguard land for future raising and maintenance in line with climate change.
- Revise the 8m from a main watercourse up to 16m. This safeguards land for future flood defence construction and the associated construction and maintenance access required.

Dorset Catchment Partnerships

- The 8m buffer recommended for flood schemes and main rivers should be extended to ordinary water courses or the current flood plain, whichever is the greater.
- Headwaters are key in the storage of water to reduce flood impact throughout the catchment.
- The Plan should acknowledge that space for water is needed in the unconstrained river floodplain to restore natural processes for rivers; providing public water services and restoring the biodiversity of freshwater habitats.

Dorset Wildlife Trust

- We are concerned that criteria VI could mean that river restoration and other nature-based projects could fall foul of this policy.

Sturminster Marshall Parish Council

- The Parish Council questions whether 8m from a main river is an adequate distance for development due to unpredicted flooding events, which have been experienced in Sturminster Marshall.

Charmouth Parish Council

- An 8m buffer for new development from a river or flood alleviation measure is proposed: is this appropriate and/or should it be defined in terms of vertical height rather than horizontal distance?

Lichfields on behalf of Bourne Leisure

- Further clarification is required with respect to Part VI - Policy or its supporting text needs to define what constitutes a 'main river'.

Public response

- vi) - should be defined by "a height above" as well as "the distance from".

Criterion VII.

Historic England

- We would also be pleased if new flood defence and/or management schemes that are intended to conserve and improve flood resilience for heritage assets, especially 'at risk' heritage assets, could be encouraged by this Policy.

Puddletown Area Parish Council

- We would query why reference to flood defences is not detailed elsewhere in the plan?

Public response

- There should be greater scrutiny (including cost and relevance) around the impacts of flood defence and management measures to ensure that they mitigate rather than add to problems.

Policy approach - additional criterion

Environment Agency

- Dorset Council should consider including a standard policy on culverts on development sites.
- We recommend that Dorset Council's position on when a Site-Specific Flood Risk Assessment is required should be included here
- We recommend this should include a statement clarifying when a Sequential Test is required and the search area (rather than just in the supporting text).
- The policy should include a statement clarifying that development in the floodplain should undertake compensatory works to reduce the overall flood risk.

Historic England

- New criteria should be introduced into Policy ENV13 to address issues of flooding and flood defence schemes, including SuDs, changes to hydrology in wetland areas, river restoration, wetland creation and tree planting on the historic environment.

Dorset Local Nature Partnership

- Recommend a policy is included which allows river restoration projects which permits development which delivers environmental gain implementation of nature-based solutions or re wildling, for flood solutions. These generally need planning consent and may fall foul of the 'no development within 8m of river' policy.

15.3. Other issues

Site allocation process

East Dorset Environment Partnership

- All site allocations should be preceded by detailed consideration of the underlying geology, the consequences of the geology for ground infiltration without adding to increasing groundwater or surface water flood risk and deliverability of SUDs.
- Concerned that sites won't be deliverable as they have failed to address biodiversity and drainage issues.

Wool Flora and Fauna

- Policy should emphasise avoidance of flood risks when making allocations.

The Erica Trust

- Concern with proposed allocations on hillsides and impacts of increased rainfall.

ADVEARSE

- It is also very concerning that the council are contemplating building houses in sites at unavoidable risk of flooding.
- It is well understood that there are sites close to flood risk areas that will in a few years become also at risk of flooding due to climate change.

Public response

- Policy allocations for homes at Corfe Mullen are susceptible to ground water flooding and therefore should not be allocated in the local plan.
- The Plan identifies biodiversity considerations which show that, in some rivers, flooding may adversely affect development sites.
- It does not actively identify opportunities to develop existing SSSIs (e.g. aquatic and bankside vegetation) for purposes of local tourism and investment. It largely focusses on reducing flood 'risk'.
- Concern with allocation of land in floodable areas.
- Building fewer homes will reduce flood risks.
- Query whether the policy could include a requirement for the developers of sites to meet the costs of any increases in insurance premiums for existing home owners in the same drainage catchment.
- South East Dorset has a serious flood issue, which will only get worse as climate change occurs.
- Flood extents from 1 in 10 AEP and 1 in 50 AEP should be modelled, significant flood risks at Lytchett Minster, climate change likely to increase the risks from flooding and proposed housing allocations at Lytchett Matravers is likely to have a detrimental effect on flood risk around Lytchett Minster.
- Council should not consider land, which is flood risk now, or in the future (taking account of climate change), suitable for development with homes.
- Development of homes increases flood risk/climate change.

Planning Applications

Town and Parish Councils

- Planners must be held responsible for allowing any development in a flood risk area when being advised by local knowledge as well as historical facts.
- Local councils have more informed knowledge of historic flood events to ensure new developments do not exacerbate existing issues, particularly in light of climate change.
- No development should be permitted on land at risk from flooding (Flood Zones 1-3).

Lichfields on behalf of Bourne Leisure

- Policy provides an in-depth tool kit that will aid proposals in assessing flood risk and if further steps should be taken to ensure the development will be safe.

Public response

- No development should be permitted on land at risk from flooding.
- Developments must deliver a reduction in flood risk.

Natural Flood Management

Woodland Trust

- We highlight the role of catchment woodlands and riparian corridors in natural flood management. Trees can provide a sustainable and low maintenance solution to lessening the risk of flooding as well as delivering other environmental and economic benefits.
- Specifically: infiltration rates in soil beneath trees are higher reducing runoff, trees/vegetation/dead wood slow overland flow into watercourses, trees prevent erosion of soil and deposition of sediment in water courses (which in turn restricts flow) and tree canopies intercept rain fall slowing down the time it takes for water to reach the ground.

Sewer inundation and infiltration consultation zones

Piddle Valley Parish Council

- The problems with sewer inundation and infiltration consultation zones should be specifically referenced in the plan and shown as a constraint on the policies map.

Fire Risk

Bridport Local Area Partnership (BLAP)

- We would like to see a Plan policy addressing development at locations where there is significant fire risk.

Community Involvement

Stourpaine Parish Council

- Communities should be involved well in advance of projects relating to flooding that Dorset Council undertakes where it may be possible to reduce flood risk to properties and infrastructure.

Opportunities for local tourism and investment

Public response

- Plan does not actively identify opportunities to develop existing SSSIs (e.g., aquatic and bankside vegetation) for purposes of local tourism and investment. It largely focusses on reducing flood 'risk'.

16. Policy ENV14: Sustainable Drainage Solutions

16.1. Approach

Overall approach

Dorset Wildlife Trust

- We support this policy and in particular the reference to biodiversity enhancement.

East Dorset Environment Partnership

- Recommend that a strategic approach is taken to consider the deliverability of SUDS at a sub-catchment level rather than the piecemeal first come first served approach in submitting planning applications.

Sport England

- We support this policy and suggest drawing sports clubs to specialist guidance on this matter

Town and Parish Councils

- Agree/support.
- Section on SuDs seems plausible.
- Affected Bradpole civil parish residents will be pleased to see that these issues are understood within this draft plan.
- Note and support a specific policy in the emerging local plan.
- SuDS should be applied even on small inland sites where there is, or may be, greensand.
- The section is good, but the language needs to be more active and positive in places.
- Policy ENV14 adequately cover the necessary elements to prevent a development creating localised surface water flooding, but does not encourage – or require – developers to seek alternative areas less prone to such a risk.
- This has some impact on West Moors as over the years it is felt that the water table has risen in this area as additional areas now flood that previously did not suffer with flooding.

Erica Trust

- Lack of information in the plan about not building in areas where that building is going to increase the risk of flooding elsewhere, and challenges providing SUDs in certain locations.
- Possibility of SUDs simply not being able to cope with surface discharges from sites on steep hillsides in a time of increasing rainfall does not seem to even be considered.
- Concern with suitability of SUDs on sloping sites which have seepages or flushes - would have to cope with significantly more than just the runoff from the actual hardstanding.

Wool Flora and Fauna

- SuDs may not be appropriate on all sites.

Lichfields on behalf of Bourne Leisure

- Bourne Leisure endorses the current wording of the draft policy.
- It is a pragmatic and achievable approach to incorporating SUDs within new development. It recognises that sites and development proposals can vary.
- The emerging policy seeks to provide appropriate flexibility to incorporate SUDs effectively.

Public response

- All development must take account of SuDs.
- SuDs will not be inappropriate at all sites, e.g. where there is high ground water levels.
- No possible to mitigate surface water run-off using SuDs at all sites (SuDs may not be appropriate at some locations in Swanage where underlying geology - clay - is not permeable).
- Building less homes will reduce the requirement for SuDs.
- Supplementary Guidance is required.

Paragraph 3.15.1

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Generally OK but consider replacing “should” with “will” in policy wording.

Paragraph 3.15.2

Environment Agency

- There is no definition on what constitutes SuDS, and no clarity on when SuDS are required.

Natural England

- We welcome the reference to securing biodiversity enhancements through SuDS.

Paragraph 3.15.3

Environment Agency

- There should be mention that greenfield runoff should be achieved and draining as close to the source as possible.

Wool Flora and Fauna

- By using SuDs to manage or relocate or slow runoff by soaring water by swales etc which could be overwhelmed by flash flooding.

Natural England

- We welcomes the commitment for the development of a SuDS Supplementary Planning Document (SPD).

Gillingham Town Council

- When will the SuDS SPD be produced? There needs to be an indication of time.
- This section makes no mention of existing properties selected for redevelopment and the need to ensure that upgrading or replacing existing drainage facilities in accordance with the general binding rules 2018 is considered.

Paragraph 3.15.4

Dorset CPRE

- Typos, should read “There is a wide range of SuDs” and reference ENV14.

Paragraph 3.15.5

Dorset CPRE

- No references to the SuDs manual (C763) from CIRIA.

Figure 3.7: Types of SuDS

Dorset Local Nature Partnership

- Tree rooting increased infiltration and should also be referenced alongside evapotranspiration. Tree planting also has wider benefits in respect to biodiversity.

Forestry Commission

- Very positive to see trees listed as part of the SUDS. It would be hugely positive to note in this section that trees used as SUDS also provide a host of benefits not provided by the other SUDS listed.
- They also provide landscape, biodiversity, and carbon sequestration benefits as well as increasing infiltration of water into soil and are self-maintaining once established saving on long term costs.
- Trees should be heavily favoured by policy ENV14 over hard engineering which comes with a substantial carbon and financial cost as referred in 3.15.9.

Beaminster Town Council

- Rainwater harvesting must be encouraged and rainwater ending up in the foul/old combined sewer system must be discouraged as the system is already beyond capacity with discharge of raw sewage into the River Brit in some storm conditions.

Chideock Parish Council

- Need to work with other agencies to capture and store rainwater, and Dorset Highways and Highways England take proper responsibility for the drainage infrastructure on roads.

Symondsburry Parish Council

- We support the approach in the emerging policy but suggest that it should also reference hydrobrakes systems as well as natural solutions to managing surface water.

Public response

- Design of SuDs must take account of climate change.
- Council should seek additional benefits to water quality/wildlife and people.
- Give rainwater harvesting high priority.
- Development is reducing the environments capacity to manage flood risk.
- Retain gardens (resist re-development for car parking).
- Do more to protect mature trees (role as a habitat and carbon sequestration).

Paragraph 3.15.6

Fontmell Magna Parish Council

- Site specific FRA should be submitted with all planning applications where development would increase surface water run-off.
- the FRA should consider site characteristics and identify prevailing flood risk (taking account of all sources of flooding).

Paragraph 3.15.7

Environment Agency

- We recommend the bullets' text is changed from "unstable land" to "Land instability" and "coastal erosion zones" to reflect terminology used in later sections 3.16 and 3.17.

Wool Flora and Fauna

- SuDs may not be appropriate on land with insufficient permeable soils, land with a high water table, unstable land and contaminated land.

Paragraph 3.15.8

Historic England

- We are pleased to see that the supporting text recognises the multifunctional benefits of SuDs.
- We would welcome recognition in the supporting text that the provision of SuDs may have unintentional effects on the historic environment.

Paragraph 3.15.9

ADVEARSE

- Wording needs to be clear about developer financial contributions being obtained. All planning applications should include a financial plan to show how maintenance requirements will be satisfied over the lifetime of the development.

Public response

- SuDs should include long term management/plans to secure funding for management / maintenance.

16.2. Policy

Criterion I

Dorset Catchment Partnerships

- The policy should require that SuDS are designed to enhance biodiversity and, where possible, to include natural features such as woodlands and wetlands as appropriate to the surrounding ecological setting and networks.
- The SuDS should also be designed to deliver maximum water use efficiency, water quality, amenity and recreational improvements.

Historic England

- We support the criterion I where it mentions the need to respect the characteristics of the site and surroundings with particular note to be taken of heritage assets.

Natural England

- We welcome and supports the requirement for multifunctional SuDS design.

Bridport Local Area Partnership (BLAP)

- The wording of this SuDS policy needs strengthening. Development should not be adding to the existing flood risk.

Lytchett Matravers Parish Council

- The requirement to address existing issues should be added to the list in the policy.

Public response

- Re-draft policy substituting the words 'should' for 'must' to impose a strict requirement in respect to SuDs.

Criterion II

Wessex Water

- One of Wessex Water's main objectives is to ensure that surface water is not drained to foul sewers and it therefore supports the approach in the policy.
- Wessex Water suggest that the drafting of the policy should be revised to make this point clearer.

Public response

- No surface water run-off from any development (including extensions) should be discharged into combined sewers.

Criterion III

Barton Wilmore on behalf of Wyatt Homes

- Policy is generally acceptable, but do not support criterion III, which refers to financial contributions for the maintenance and improvement of drainage infrastructure, and contributions necessary to mitigate impact on the sewer network and local drainage.
- Mitigation through financial contributions can be considered on a site by site basis, through each individual planning application and legislation already sets out how and where financial contributions can be sought. It is not considered necessary to repeat this in Policy ENV14.
- Where financial contributions and/or mitigation is required, due process already is in place for the Applicant to seek agreement with the drainage authorities through a Section 38 Agreement - not considered necessary to extend this process by requiring the Applicant to make a financial contribution to the Local Planning Authority, for them to then have to distribute the funds and reach agreement with the drainage authorities.

Bridport Town Council

- All planning applications should include a financial plan to show how maintenance requirements will be satisfied over the lifetime of the development.

Public response

- Developers should be required to 'fully compensate' for the cost to mitigate impacts on the sewer network and local drainage to ensure there are no adverse effects resulting from the development rather than just, provide financial contributions'.

Policy approach - additional criterion

Amphibian and Reptile Conservation

- 'Add a new criterion. 'A strategic approach is required to consider SuDS at sub-catchment level to reduce impact to biodiversity'.

Erica Trust

- Suggestion of a new policy to discourage the selection of sites which are going to exacerbate the challenge of preventing surface water flooding of other built development/infrastructure – such as on steep hillsides and with flushes and seepages.

16.3. Other issues

Groundwater protection

Environment Agency

- Sustainable Drainage Systems part of the local plan should also include consideration of groundwater protection issues, particular for those sites that are located in Source Protection Zones.
- We support the use of SuDS provided they are used appropriately and do not lead to pollution – reference to guidance for the design and use of SuDS in residential and commercial developments is given in The SuDS Manual (C753).
- Reference to guidance: “The Environment Agency’s approach to groundwater protection” should be followed with respect to SuDS schemes, in particular Position Statement (G13).
- design of infiltration SuDS schemes and of their treatment stages needs to be appropriate to the sensitivity of the location and subject to a relevant risk assessment, considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer.
- Unless the supporting risk assessments show that SuDS schemes in SPZ1 will not pose an unacceptable risk to the drinking water abstraction, the Environment Agency will object to the use of infiltration SuDS under position statement G10.
- Reference to Table 4.3 of CIRIA C753 which sets out the requirements for the risk assessment of SuDS schemes for different pollution hazard level land uses.
- Reference to Chapter 26 of CIRIA C753 which provides guidance and descriptions of what’s required for the different levels of risk assessment, and J5 Infiltration Worksheet for detailed assessment.
- Aim of the drainage scheme should be to ensure that hazardous substances do not enter groundwater in discernible concentrations and that inputs of non-hazardous pollutants do not result in pollution.
- detailed risk assessment should demonstrate that this will be the case with any proposed scheme – reference to Guidance on assessing discernibility of hazardous substances – Groundwater Protection Technical Guidance.

Site Allocation Process

East Dorset Environmental Partnership

- Drainage problems and the inadequacy of SUDS design and delivery in these complex geological/hydrological situations is evidenced in sites delivered as new neighbourhoods at Holmwood, Ferndown and both NE and NW Verwood and in their respective SANGs.

Lytchett Matravers Parish Council

- Existing drainage issues should be dealt with before a site is developed, by way of example there is insufficient capacity in the sewer network for Lytchett Matravers.

Construction and Environment Management Plans (CEMPs)

East Dorset Environmental Partnership

- Impacts of tracking of HGVs over both the development site and land intended for SANG when ground conditions are unsuitable and even waterlogged - more detailed Construction and Environment Management Plans (CEMPs) and direct supervision to ensure they are delivered properly must be assured to prevent repeated problems.

17. Policy ENV15: Land instability

17.1. Approach

Paragraph 3.16.1

Environment Agency

- Section does not consider locations at future risk of land instability - Climate change and morphological changes over developments lifetime could pose issues in other areas not currently identified.
- There is a large crossover with Section 3.17 as highlighted by the summary which specifically includes Lyme Regis and Charmouth which are both coastal land instability.

Paragraph 3.16.2

Natural England

- Paragraph 3.16.2 - should be amended to note that biodiversity and geological interests, including those in designated sites and the Jurassic Coast WHS, can rely on naturally eroding features - New development should not be permitted to jeopardise these processes.

Paragraph 3.16.3 - Ground stability reports

Historic England

- Clarification is required on whether ground stability reports are required to consider the impacts of mitigation and stabilisation measures on the historic environment.

Land stability issues in specific settlements

Charmouth Parish Council

- The policy in the draft Charmouth Neighbourhood Plan is relevant to the Land Instability policy.

Weymouth Civic Society

- Concern with planning permission at Old Castle Road, Weymouth, and land instability issues.

The Lyme Regis Society

- Reference to issues in Lyme Regis with land slippage, subsidence, and shift from natural springs and water courses.

Public response

- Further development in Swanage will result in additional drainage and flooding and this will impact on land stability.

Climate change

Public response

- Land instability is likely to increase due to the impacts of climate change and this should be recognised in the Policy.

17.2. Policy

Policy approach

Town and Parish Councils

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

Weymouth Civic Society

- Policy could be firmed up to convey that permission will not be granted if the site is subject to serious land instability except in very exceptional circumstances.

Public response

- General support for the policy.

Criterion I.

Natural England

- ENV 15, Clause I - wording should be amended to highlight the need to protect environmental assets. Suggest this is achieved by the following amendment: “unless it can be demonstrated that the site is stable or could be made stable without compromising wildlife or geological interests, and that the development is unlikely to trigger land sliding, subsidence, or exacerbate erosion within or beyond the boundaries of the site.”

Weymouth Civic Society

- Phrase 'to avoid putting people's lives at risk' seems rather restrictive as the only reason for refusing permission on unstable land - should be other valid reasons such as risk to neighbouring property, access roads - suggest deletion of phrase if cannot be broadened.

Additional criteria

Historic England

- ENV15 and text should recognise that land instability can affect the historic environment leading to heritage assets being 'at risk', damaged, lost and/or uncovered. They should also set out how land instability will be approached where it affects the historic environment.

18. Policy ENV16: New built development in Coastal Change Management Areas (CCMAs)

18.1. Approach

Paragraph 3.17.1

Beaminster and Villages Local Area Partnership

- There are worsening problems with coastal erosion and this concern does not appear to be subject to clear forward thinking.

Public response

- Coastal erosion needs to be given greater emphasis in the plan.
- Flooding and drainage issues and extra people results in erosion.

Paragraph 3.17.2 - Shoreline Management Plans

Environment Agency

- Mapping and zone definition of Coastal Change Management Areas is required - Without this there is no distinction between the policies for land instability and coastal erosion/ change.
- Reference to guidance on coastal change adaptation should be included.
- Paragraph 3.17.2. recommend to change text to “some communities along the coastline may be affected by a change in policy approach over the course of the SMP”.
- Paragraph 3.17.2. recommend you consider adding text at the end of this paragraph “Many of the changes in management approach will be triggered by catastrophic events and/or failure of life-expired defences.”.

Paragraph 3.17.4 - The process of defining CCMAs

Historic England

- Heritage impact assessments should be undertaken to inform the preparation of Shoreline Management Plans, the designation of CCMAs and the selection of locations and sites for new or amended defences and other management options.

Environment Agency

- Paragraph 3.17.4. There is no reference to where the single CCMA region policy map is. This needs to be referenced better.

Weymouth Civic Society Planning and Environment Committee

- Concern that marked CCMAs do not extend down to the shoreline - leaves lengths of unstable cliffs and undercliff not protected by this safeguard.

Paragraph 3.17.5 - Affected areas and coastal defences

Environment Agency

- Paragraph 3.17.5. This list of locations is not exhaustive for coastal defences. We recommend to consider changing text before location list to “Locations include but are not limited to...”.

Network Rail

- It will be interesting to see what the BCP Local Plan says about this given that the SWML runs along the coast particularly in the Poole area and in the Solent area to the west of Southampton Central station.

Symondsburry Parish Council

- Raise a query around wider policy relating to management of the coastline (i.e. policy position in respect to 'hold the line', 'no active intervention' and 'managed realignment').

Portland Town Council

- There is no specific reference to protecting Portland Beach Road and Ferry Bridge from flooding, although Chiswell is recognised. This was very specific in the previous plan.
- Dorset Council seemed slow to react to a recent breach at Chiswell, highlighting the need to maintain defences at Portland. Consideration of use of natural flood defences which would also support carbon sequestration.

Public response

- Concern that further development in Swanage will increase the already significant levels of coastal erosion.
- Shore Road in Swanage is threatened by rising sea levels and storms - the emerging local plan does not identify or safeguard an alternate route for the road.
- Need to ensure protection from coastal erosion needs to be secured for all properties in Weymouth from Newtons Cove to Small Mouth Cove including grade I scheduled monument Sandsfoot Castle which is suffering structural movement due to coastal erosion.
- Concerns over coastal erosion extent at Weymouth.
- More work should be commissioned on the impact of sea change rises on Chesil Bank.

Paragraph 3.17.6 - Types of development within CCMA's

Symondsburry Parish Council

- Raise a query as to whether caravan sites would be treated as inappropriate development in a CCMA.

Sport England

- Volunteer sports clubs could be adversely affected, due to the additional consultant costs for what may be a very small extension which may be necessary for the club to grow or allow for disabled members to join.

Green Party Group of Dorset Councillors

- Broad support however since extensions can be substantial we think any proposals for extensions should be accompanied by a geological appraisal to show that it will not have any material impact upon coastal change.

Weymouth Civic Society Planning and Environment Committee

- New development should not be permitted on any coastal land of high instability, whether or not in the CCMA.

Public response

- No new buildings to be allowed.

Climate change

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Need to consider the impact of rising sea levels resulting from climate change.

Public response

- The wider issues of impact on the Climate from new development is also leading to increased coastal erosion.

18.2. Policy

Policy approach

Symondsburry Parish Council

- Support the policy approach.

Criteria I.

Weymouth Civic Society Planning and Environment Committee

- Support for policy criteria I.

Criteria II. and III.

Jurassic Coast Trust

- Would like to see 'avoid negatively impacting the environment' or similar added to the points under criteria II and III of the policy.

Public response

- Need to clarify statement 'not prevent communities from sustainably responding to the impacts of climate change'.

Additional criteria

Historic England

- Policy ENV16 should have criteria that consider the impacts of new built development in CCMA's on the historic environment.
- The supporting text should cross refer to 3.7.4, which describes how coastal defences could be harmful to the World Heritage Site. ENV16 should contain an associated criterion.

19. Policy ENV17: Replacement or relocation of existing development in Coastal Change Management Areas

19.1. Approach

Paragraph 3.17.11 - Impacts of New relocated development

Historic England

- Recognition in paragraph 3.17.11 that the replacement or relocation of existing development in CCMA's may impact on heritage assets is welcomed. It should also be recognised that the relocation may itself be a heritage asset and may be 'at risk' or result in an asset becoming 'at risk'. Clarification is needed on how this matter will be approached in ENV17.

Natural England

- Concerned that the policy includes existing caravan and camping sites which would not otherwise receive permission within the Dorset AONB and Heritage Coast, or setting of the Jurassic Coast and would be in contravention of emerging local plan policy ECON8.
- Policy should exclude these types of facilities, or only permit them if the relocation provides a substantive benefit to the AONB, Heritage Coasts and Jurassic Coast WHS from the early removal of these facilities from existing visually intrusive localities, and the relocation meets the objectives of the Dorset AONB Management Plan.

Public response

- The replacement building must meet all the other Policies and help mitigate/adapt to climate change.

Affected areas

Charmouth Parish Council

- Priority has to be given to the significant improvement of Charmouth's coastal defences rather than any relocation of premises or services.

Symondsburry Parish Council

- There are specific areas that will need future protection such as Eype Mouth near Bridport – it is clear that as in this example sea defences should be considered where the public have always accessed coastal waters, with other areas left to the natural forces of nature – query whether this has been considered in the plan?

Process of relocation

Environment Agency

- There should be acknowledgement that those living in CCMA's may not be able to afford to relocate. Where this is the case, what are the options then – will the council offer them temporary or permanent residence elsewhere?

19.2. Policy

Policy Approach

Symondsburry Parish Council

- Support for the policy approach.

Thornhackett Parish Council

- Policy subsections are wrongly numbered. ENV17.IV to ENV17.VII should be numbered .I to .IV respectively.

Jurassic Coast Trust

- Development is referred to in the main text of criteria I but then the following points only refer to buildings - should be consistent and the term development is more appropriate - encompasses the wider reality of what exists at the coastline such as rights of way, gardens, caravan and camp sites etc which are not buildings but could still be reasonably considered development in the context of CCMA's.

Public response

- The policy should refer to adaptation to coastal change, as that is essentially what is being asked of communities where CCMA's are applied.

Criterion V.

Bridport Area Neighbourhood Plan Joint Councils Committee (JCC)

- Policy ENV17, criterion V - good to see use of the phrase "appropriate for" rather than "in keeping".

Additional criteria

Historic England

- Policy ENV17, suggestion to add new criteria to require replaced and/or relocated development to conserve and enhance the significance of heritage assets, including their settings, and the wider townscape, landscape and seascape. Cross refer to policy ENV5.
- Policy ENV17, suggestion to add new criterion that makes clear that replaced or relocated development and infrastructure in CCMA's should not prevent natural erosion in the World Heritage Site. Add links to policies ENV5 and ENV6.