Bridport Area Neighbourhood Plan Review

Dorset Council Comments

Introduction

Thank you for consulting Dorset Council on the Bridport Area Neighbourhood Plan (Review), March 2026.

This response considers the extent to which the Plan complies with National Policy and Guidance (primarily the National Planning Policy Framework, December 2024) and includes an assessment of housing supply (a new basic condition). The neighbourhood plan should also contribute to sustainable development and be compatible with EU obligations (under retained EU law) including the SEA Directive of 2001/42/EC.

The comments provided are based upon the requirements to meet the 'basic condition' tests relating to the production of the neighbourhood plan.

This response contains specific advice from specialist teams or officers within Dorset Council such as: Conservation, Development Management, Housing, Natural Environment Team (NET), Transport Development Management, Nature Recover Officer, Senior Environmental Officer, and Planning topic leads on Biodiversity & Employment.

All comments are from the Planning Policy Team unless attributed to a specific team or policy lead.

Type of modification

Planning practice guidance (Paragraph: 106 Reference ID: 41-106-20190509) explains that there are 3 types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves:

- Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
- Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example,

entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.

- Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

The accompanying modification statement to the plan explains "Bridport Town Council, as Qualifying Body, considers that the 2025 review of the BANP amounts to material modifications which do not change the nature of the plan but are sufficient to bring the BANP up to date and relevant to the needs of the Bridport Area" This view is supported by ten reasons.

Dorset Council have reviewed these reasons and the scale of changes within the Plan though its own modification statement and agree that the proposed changes are 'Material modifications which do not change the nature of the plan'.

Relationship with the Draft National Planning Policy Framework (December 2025)

On the 16 December 2025 the Government published an open consultation on the National Planning Framework: Proposed changes to the Planning system. The consultation ran until 10 March 2026. We understand that the government intend to publish the final version of the new NPPF later this year.

The full implications of these national changes have yet to be fully understood, however, the draft text has several direct implications for the preparation of Neighbourhood Plans.

Annex A of the draft NPPF (page 98) sets out some transitional arrangements. Firstly, it says that the new NPPF must be taken into account in decision making from the day of its publication. It adds that development plan policies that are in any way inconsistent with policies in the new NPPF should be given very limited weight.

Secondly, it states that neighbourhood plans that have been submitted under Regulation 15 on or before the date of publication of the new NPPF should be prepared in accordance with the current December 2024 version of the NPPF. Any neighbourhood plans not submitted by that date must comply with the new NPPF.

The Bridport Neighbourhood Plan was submitted on 28 April 2026 and before the publication of the new NPPF. Consequently, the Plan should be examined against the December 2024 version of NPPF.

The caveat here is that when the new NPPF is published, its policies could supersede policies in the neighbourhood plan if there is any inconsistency.

New Basic Condition

Sections 98 and 99 of the Levelling-up and Regeneration Act 2023 amend the Planning and Compulsory Purchase Act 2004 and came into effect on 25 March 2026. Consequently, there is a new Basic Condition requirement: *"the making of the draft plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the draft plan were not to be made."*

This new Condition replaces the former Basic Condition that the draft plan be in general conformity with the strategic policies contained in the development plan for the area. For neighbourhood planning practitioners, this appears to be a shift from asking whether a neighbourhood plan is simply in general conformity with strategic policies, towards a more explicit test that the plan is not housing-suppressive and does not undermine planned housing delivery.

Our assessment of the Bridport Area Neighbourhood Plan concludes that none of the policies are supressing housing supply.

Plan Period

The Plan period 2020-2036 is clearly displayed on the front cover. A requirement for submission.

Neighbourhood Area

Dorset Council supports Map 1 which depicts the Neighbourhood Plan area, a requirement for submission. It is noted that that the Plan Area was updated to reflect a Community Governance Review in 2023.

Climate Change

Policy CC1 Publicising Carbon Footprint

The following comments have been received from the Development Management Team. Climate Change p31 - what is meant by "significant development " as it doesn't appear to be defined? This change isn't then reflected/included in the amendments to Policy CC1.

Access & Movement

Policy AM6 Transport Hub Proposal, criterion a)

The Transport Development Management Team welcome the updated criterion a) which responds to their earlier regulation 14 comments to include a specific reference to safeguarding a walking and cycling link through the bus station. As a suggestion, the TDM team often uses ‘wheeling’ as well to include mobility buggies and wheelchairs, keeping in mind Active Travel, and The Equality Act 2010.

Economy & Employment

Policy EE1 Protection of existing employment sites

Development Management Team

The following comment has been received from the Development Management Team.

Policy EE1, criterion 1 now references Class E, B2, B8. While the rationale for the change is explained, any application for Class E would also include 'retail' so perhaps it should say applications for 'Class E(g)' and not simply the wider 'Class E', if the policy is looking for the protection of traditional employment uses - notwithstanding that jobs are created through shop retail uses too.

Employment lead

The following comment has been received from the Employment lead.

The revisions appear to have sought to address previous concern regarding references to the former B1 use class. Policy EE1 now refers to Class E, B2 and B8 uses, which aligns with the current Use Classes Order. However, as my previous comments set out, Use Class E encompasses a broad range of commercial, business and service uses. Uses previously defined in the revoked Class B1 are now covered specifically by part E(g). As currently drafted, the policy would appear to be supportive of uses in the wider class E including creche, nurseries, indoor sport and recreation, retail and sale of food and drink - I am not sure if this was the intention.

Some of these uses would be considered town centre uses and there may be additional considerations in this regard.

There remains some uncertainty regarding the relationship between the supporting text and the policy itself. The supporting text refers to evidence identifying a need to protect sites providing flexible, small-business and shared workspace, citing the Old Timberyard in West Bay as an example. In contrast, Policy EE1 only applies to the Old Laundry and East Road trading estates. It is therefore unclear whether the references to wider employment sites are intended to be contextual only; or the plan is seeking to establish a broader safeguarding approach that is not reflected in the policy wording. If the latter is intended, additional policy wording or supporting justification may be required. If not, some refinement of the supporting text could help avoid confusion regarding the scope of the policy.

I would note that as non-key employment sites, Policy ECON3 of the adopted Local Plan would be relevant in the consideration of development at Old Laundry and East Road trading estates. Draft Neighbourhood Plan Policy EE1 appears to take a more protective approach than Local Plan Policy ECON3 by seeking to retain employment generating uses on the Old Laundry and East Road Trading Estates and not supporting uses that do not provide direct ongoing local employment opportunities regardless of circumstances. Unlike ECON3, the policy does not appear to provide any explicit flexibility where continued employment use may no longer be viable etc. However, I also note that this stronger safeguarding approach is consistent with the current Policy EE1 in the made Bridport Neighbourhood Plan.

Policy EE2 Provision for New & Small Businesses

The following comment has been received from the Employment lead.

This section has been strengthened through additional supporting text. In particular, the draft now includes a more detailed explanation of live-work units, describing their mixed residential and workspace function and recognising that they are often treated as sui generis forms of development. This addresses, at least in part, previous requests for clarification regarding what is meant by "live-work" development. Notwithstanding these improvements, Policy EE2 itself remains relatively broad and continues to lack locational or operational criteria. The supporting text provides useful explanation, but much of that detail is not carried through into policy wording. The policy supports start-up businesses, co-working hubs and live-work spaces, working from home, and microbusinesses. However, it does not clearly explain:

- where such development would be appropriate;

- how proposals should be considered alongside wider Development Plan policies;
- whether support extends to employment sites, settlement locations and rural locations equally; or
- how live-work proposals should be treated where conventional residential development may not otherwise be acceptable.

As a result, there remains potential uncertainty regarding how Policy EE2 would operate in decision-making. I still feel that the policy could benefit from clearer criteria linking the support for the identified development types to appropriate locations and wider policy framework etc.

So, while I would like to acknowledge the changes made to the plan to address issues previously raised, I also feel there are still some residual concerns outstanding around clarity and implementation.

Housing

Housing Needs Assessment

We welcome the additional text on page 4 of the Plan that explains the relationship between the 2019 HNA, 2025 update prepared by AECOM and Bridport Area HNA supplement, approved in January 2026.

Definition of Affordable Housing

The following comment has been received from the Housing Team.

I have had a look through and would recommend that the Affordable Housing definition on page 48 is replaced with a direct reference to the National Planning Policy Framework (NPPF) Annex 2 definition of Affordable Housing. This would ensure consistency with national planning policy and avoid any potential ambiguity regarding qualifying affordable housing tenures and eligibility requirements.

Policy H2: Placement of Affordable Housing

No specific comment, the additional exception is noted.

Policy H3: Affordable Housing Exception Sites

The following comment has been received from the Housing Team.

Within the supporting text, the Peter Foote Play Area has been identified as suitable for a small community-led affordable housing development. The current wording appears to limit delivery to social rented housing. Whilst social rent may be the preferred tenure, there may be circumstances where an alternative affordable

housing tenure is needed to secure a viable and deliverable scheme. The wording could therefore be amended to refer to *affordable housing, preferably at social rent*, or similar, to provide some flexibility whilst maintaining the aspiration to maximise the provision of social rented homes.

Policy H4: Housing Mix & Balanced Community

The following general comments has been received from the Development Management Team. Policy H4 - H4.2 - There is no definition of "smaller, lower-cost homes " which means there is room for ambiguity.

Policy H5: Sheltered or Retirement Home or Extra Care Home Developments

No specific comment amended wording is noted.

Community Facilities

Policy CF1 Protection of Existing Community Infrastructure

We have no concerns with the additional four community facilities added to the table on page 57.

Heritage

Policy HT1 Non Designated Heritage Assets

The following comments have been received from the Conservation Team.

- The changes though this review involve relatively minor policy wording to align the NP wording with other relevant policies/guidance, none of which directly relate to policies relating to heritage assets.
- The amendments do not seek to add any new site allocations.
- The review does not take the opportunity to review the Joint Committee's list of non-designated heritage assets. We would encourage the NP Group to re-visit this list, with an aim to nominate all qualifying assets to be added to the Dorset Council Local Heritage List: https://www.dorsetcouncil.gov.uk/documents/d/guest/local-heritage-list-for-verification-2024
- Please note that the web-links to the Joint Committee's list in the NP document (Policy HT1) do not work and require updating to: https://www.bridport-tc.gov.uk/wp-content/uploads/2019/03/Non-designated-assets-List-March-2019.pdf

- Conservation would be pleased to offer further assistance to the NP Group in response to any of the above comments.

Landscape

Policy L1 Green Corridors, Footpaths, Surrounding Hills & Skylines

Biodiversity Lead

The following observations have been received from the biodiversity lead.

Although the policy wording has been updated to reflect the change in name from AONB to National Landscape, the content of policy L1 (solely focused on development in the National Landscape) is still not reflected in the title. This part of the initial comment still stands, and I would still recommend renaming the policy '*L1 Development in the Dorset National Landscape'* for clarity.

With references to early comments made at Regulation 14 stage,-I still feel the plan would read better if the policies were split into one of habitats and biodiversity areas and one on species impacts but am content with the current policy wording if that is preferred.

Natural Environment Team (NET)

The following comment has been received from NET.

Neither the policy wording nor supporting text describe what Green Corridors are or are very specific about identifying or protecting these. So, we think this policy could be improved to be of much more value, and the LNRS could be helpful in filling in the gaps.

Nature Recovery Officer

The following comments has been received from the Nature Recovery Officer.

Since preparation of this Neighbourhood Plan began, a new requirement for neighbourhood plans to take account of Local Nature Recovery Strategies was introduced in March 2026 (See paragraph 2B of Section 38B) that you may not have been aware of. It is therefore recommended that the Bridport Neighbourhood Plan strengthens its reference to the Dorset Local Nature Recovery Strategy as this county-wide strategy should complement and support some of the policies and maps included in the neighbourhood plan.

The existing reference to the Dorset LNRS on page 69 appears within a broader section on how BANP supports protecting green infrastructure in the

neighbourhood plan area. While it is positive to see the LNRS acknowledged, I suggest slightly redrafting the section (suggested text below).

Green Corridor Management

*The term green corridors refers to the network of vegetation that connect habitats such as parks, forests, and other natural habitats to support the movement of wildlife. ~~green spaces and linkages that~~ These corridors are important biodiversity assets. ~~The Dorset Local Nature Recovery Strategy (2025) identifies key pressures and opportunities for nature recovery in the wider Bridport Area.~~ As such, the green infrastructure network will be given significant protection from development.**

The Dorset Local Nature Recovery Strategy (LNRS) (2025) identifies key pressures and opportunities for nature recovery in the wider Bridport Area. It has13 nature recovery priorities, and protection of green corridors is particularly relevant to the delivery of priorities 6 – urban and 12 – species abundance and diversity. The Dorset LNRS local habitat map also identifies high opportunity nature areas, with mapped potential activities suggesting what type of habitat creation or enhancement could be most beneficial in an area. The map can therefore be used to help inform site design and help protect or expand green corridors.

As this section refers to green infrastructure, I also wonder if it may be more appropriate to move these points alongside the Green Infrastructure section on page 75, before Policy L5.

I would also suggest mapping which green spaces and linkages you have identified as green corridors that the BANP wishes to protect.

Map 7 Designated Biodiversity Areas

Map 7 (page 70) has no key so it is unclear what it shows. If Map 7 is intended to show areas that already receive protection within the planning system for their biodiversity value, I would suggest using the nature areas of national importance layer from Dorset LNRS local habitat map. You could also include a map showing the 'high opportunity nature areas' layer to highlight locations where nature recovery activity could deliver the greatest benefits.

Dorset Local Nature Recovery Strategy links

Below are some additional suggestions to help strengthen the link between your Neighbourhood Plan and the Dorset LNRS:

- Page 71: Consider adding a reference that Policy L2 supports delivery of Dorset LNRS Priorities 6 – Urban and 12 – Species Abundance and Diversity.

- Page 75: Consider adding a reference that Policy L5 supports delivery of Dorset LNRS Priority 6 – Urban.
- Page 87: Consider adding a reference that Policy D5 supports delivery of Dorset LNRS Priority 6 – Urban.
- Page 91: Consider adding a reference that Policy D9 (e) and (f) support delivery of Dorset LNRS Priority 6 – Urban.
- Page 92: Consider adding a reference that Policy D10 supports delivery of Dorset LNRS Priority 6 – Urban.
- Page 72: Consider noting that the following Local Green Spaces are identified within Dorset LNRS mapping
    - Local Green Spaces E and I are covered by the High Opportunity Nature Areas and Potential Activities layers
    - Local Green Spaces B, J and T are covered by the Nature Areas of National Importance layer.
- Pages 74–75: Consider noting that some of the Green Gap/Anti-Coalescence Areas are partially covered by either the Nature Areas of National Importance layer or the High Opportunity Nature Areas layer within the Dorset LNRS Local Habitat Map.

Policy L2, criterion 2 and Maps 7, 8 & 9

The following comments has been received from NET.

Policy L2 - Biodiversity, in particular part 2, could be improved in terms of both the wording and the mapping. The policy wording seems to use landscape/conservation wording (character, setting, quality, amenity value) and seems to do little to protect against harm to the biodiversity of these sites. I would suggest: "*proposals that would result in their loss or harm to their character, setting, accessibility, appearance, quality, or amenity value integrity or biodiversity should be avoided*". That's not to say that the other wording should be removed entirely but might be better suited to a different policy.

It's unclear exactly which sites are identified in Map 7, in the absence of a key. It seems to pick out SAC/SPA/Ramsar/SSSI/LNR sites, but I'm unsure what is shown in green. I would suggest using the nature areas of national importance from the LNRS mapping and having high-quality images with a key.

We are unsure where Map 8 is taken from. It shows Ancient Woodlands, but the other habitats don't appear to match up with Priority Habitat Inventory mapping or

any other mapping I can find. As with SNCIs, Priority Habitats receive limited policy protection so there is an opportunity through this NP to provide something stronger. Priority Habitats are referred to very briefly under a Wildlife and Biodiversity heading on p69, but I think part 2 of Policy L2 could benefit from being made more specific by referring to these specifically.

Ideally, some reference should be made in Policy L2 to Sites of Nature Conservation Interest (SNCIs) as they currently receive very little policy protection in comparison to the designated sites in Map 7. I'm aware that there are issues in identifying these on a map, which is why they appear only as points in the LNRS mapping, but this could be used alongside being referred to in the policy text.

This would leave a policy which says something along the lines of: *"Proposals must seek to avoid the loss of Sites of Nature Conservation Interest (SNCIs), nature areas of national importance (Map 7), important and Priority Habitats (Map 8), and river corridors (Map 9, and must avoid harm to their integrity and biodiversity."*

Policy L2, criterion 3

The following general comment has been received from the Development Management Team. Policy L2 3. Could do with clarifying where it says 5 metres that it's 5 metres in height.

Policy L3 Local Green Spaces

Extended site N meets NPPF, para 107 criteria and can be supported.

Design for Living

Policy D9: Environmental performance (see also Policies CC2, CC3)

Applicants are encouraged to design buildings to last, employing modern innovative technologies and methods of construction to, for instance, reduce construction costs, speed up construction, and minimise energy consumption and carbon emissions during the building's lifetime, such as: g) Designing homes to meet Building Regulations Part M4(2) category 2: Accessible and Adaptable dwellings.

The removal of 'lifetime homes standard' is noted. Planning update March 2015 - GOV.UK advises "Neighbourhood plans should not be used to apply the new national technical standards." but we believe they can be 'encouraged'.

Strategic Environmental Assessment (SEA)

The Regulation 14 version of the Plan is accompanied by a Strategic Environmental Assessment (SEA) Screening Report dated October 2025.

The Screening Report concludes "The Bridport Area Neighbourhood Plan is unlikely to result in significant environmental impacts, largely due to the plan not looking to bring forward additional housing site allocations. BANP is supported by an extensive evidence base, and the environmental protection provided by the existing policies in the West Dorset, Weymouth & Portland Local Plan which provides environmental protection."

The consultation bodies, which comprise Natural England, Historic England, and the Environment Agency were consulted between 2 October 2025 – 7 November 2025. Their feedback has yet to be shared with Dorset Council.

The Council's Senior Environmental Assessment Officer has been consulted, and they were not aware of any local information which would draw a different judgement to the SEA Screening conclusion. They did however suggest that the SEA conclusion could now be updated to reflect the outcome of the consultation and the statutory responses appended to a consolidated report.

Habitats Regulation Assessment (HRA)

No draft Habitat Regulation Assessment (HRA) or Screening Assessment accompanies the submission version of the Neighbourhood Plan however sufficient information was provided for Dorset Council, as the competent authority, to draw a conclusion which was recorded in a HRA dated May 2026.

The HRA screening exercise considered the potential threats, pressures and activities which may affect the European sites within 20km of the Bridport Area Neighbourhood Plan.

The HRA screening identified a likely significant effect upon the Chesil and the Fleet SAC, the western most extent of which occupies the coastal area on the southern corner of the plan area, from recreational pressure. The Chesil and the Fleet SAC is characterised by a shingle bar which supports the perennial vegetation of stony banks and annual vegetation of drift lines habitats within this section of the SAC.

The Appropriate Assessment concluded that policy wording was required, perhaps as a change to the wording of policy L2, to highlight the need for a contribution towards the Interim Strategy for Mitigating the Effects of Recreational Pressure on the Chesil Beach and the Fleet SAC, SPA and Ramsar.

Providing that this mitigation is provided, then it can be concluded that the Bridport Area Neighbourhood Plan does not result in an adverse effect upon the integrity of a European site.

On the 18 May 2026 we consulted Natural England as the appropriate nature conservation body. Natural England responded on 3 June 2026 with **no objection**.

"Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given."