

Planning Policy, North Dorset District Council  
by email  
[planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

23<sup>rd</sup> January 2014

Dear Planning Policy

**Re: North Dorset Local Plan 2011-2026 Pre-Submission draft**

This response is made on behalf of the Dorset Area of Outstanding Natural Beauty. Under the terms of the adopted Planning Protocol, the response is made with delegated authority of the Dorset AONB Partnership Board on behalf of the landscape itself. This response is made with consideration for

- the purposes of AONB designation (National Parks & Access to the Countryside Act 1949),
- the relevant sections of the Countryside & Rights of Way Act 2000,
- the relevant sections of the National Planning Policy Framework, and
- the relevant AONB Management Plan

Apologies for a response in this format which I have tried to keep as close to your response questionnaire as possible. Neither SurveyMonkey nor the word document form was suited to making numerous detail responses as below.

**Part A**

| Personal Details |   |
|------------------|---|
| Title            | Mr  |
| First Name       | Tom   |
| Last Name        | Munro                                       |
| Job Title        | Dorset AONB Manager                         |
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**Part B**

- 1: These comments relate to the **North Dorset Local Plan 2011-2026 Part 1**  
2: Comments:

| Ref              | Comments  |
|------------------|---|
| 2.35             | We support this reference to AONBs ( <i>hereafter "Support"</i> )   |
| 2.37 (3)         | ( <i>Bracketed figure refers to bullet number.</i> ) Support  |
| 2.46 (4)         | Potentially ambiguous statement - could be read as the desire to have, in 15 years' time, sustainable rural communities that are smaller than they currently are. Presumably this is not the case?  |
| 2.50 (1)         | Wildlife and cultural heritage are aspects of landscape. We suggest re-wording the first bullet to:<br><b>Ensuring that North Dorset's landscape, wildlife and cultural heritage are protected and well managed</b>   |
| 3.7 (3)          | Support   |
| POLICY 1<br>p 33 | Support - we are satisfied that the AONBs' Management Plans as included as material considerations defined in 3.7 would give an adequate framework to enable refusal of planning permission in potentially harmful cases where no Local Plan policies are relevant (policy paragraph 4) |
| 4.21             | Support - the AONB Management Plan and advice from the team can help the Planning Authority establish 'appropriateness' of proposed schemes.  |

|                      |   |
|----------------------|---|
| POLICY 3<br>pp 48-49 | This policy seems to focus almost entirely on securing climate change mitigation and adaptation in new developments. We suggest it should also include a policy statement with reference to renewable energy developments in their own right, reflecting the intention behind para. 4.21  |
| pp 50-55             | Landscape is a concept (and term) that encompasses geology, topography, wildlife, cultural associations, land use and the historic and built environment. It is greater than "The Natural Environment". We suggest having separate policy sections for Landscape, Wildlife and Historic Environment.  |
| 4.42                 | Suggest re-wording the final sentence to:<br><b>The landscape of North Dorset is nationally important with almost 40% being covered by Area of Outstanding Natural Beauty designation.</b>  |
| 4.43                 | Suggest re-wording of 2 <sup>nd</sup> sentence to:<br><b>Development in inappropriate locations and of poor design <i>and/or materials</i> can harm the landscape and erode the character of an area.</b>   |
| 4.46 - 4.50          | Support   |
| 4.56                 | Suggest re-wording 1 <sup>st</sup> sentence to:<br><b>Where there may be a significant impact on the landscape, development proposals should be accompanied by a landscape and visual impact (LVIA) based on best practice guidance.</b>  |
| 4.59                 | While paraphrasing NPPF, this paragraph should include reference to the need to prove "exceptional circumstance" as well as public interest. In addition, the second bullet should include reference to seeking to meet the need for the development in another way. Also the third bullet should refer to effects being 'moderated' (as per NPPF) as this would include consideration of avoidance and potential compensation for residual effects rather than solely mitigation.  |
| 4.60                 | Suggest rewording 2 <sup>nd</sup> sentence to:<br><b>The two AONBs have Management Plans which encourage a partnership approach to long-term action to protect the AONB's landscape character and special qualities.</b><br><br>This para also includes a repeated reference to the presumption against major development unless there is an overriding need - again, wherever this is stated it would be beneficial to include reference to the need to prove "exceptional circumstance".  |
| 4.62                 | Suggest re-wording 2 <sup>nd</sup> sentence to:<br><b>Outside the District the Dorset AONB occupies the downland to the south of the Blackmore Vale, the downs, vales and hills of West Dorset and much of the coast from Lyme Regis to Poole.</b><br><br>Forestry occupies a surprising area of NDDC's Dorset AONB area, with large woodlands around Milton Abbas, Bulbarrow and Blandford Forest. Suggest re-wording 3 <sup>rd</sup> sentence to:<br><b>The part of the AONB within the District is characterised by chalk downland with agriculture and forestry being the major land uses, including mixed arable and livestock grazing.</b><br><br>Suggest additional inclusion of a statement outlining the area's special qualities (for consistency this should also be done for CCWWD AONB in the preceding para). For example:<br><b>The Dorset AONB is noted for its diversity of landscape types, its tranquility and sense of remoteness, wildlife of national and international significance, exceptionally-well preserved historic environment providing a 'living textbook' and a rich legacy of cultural associations.</b> |
| 4.63                 | Suggest rewording 1 <sup>st</sup> bullet to:<br><b>The need for the distinctive characteristics and special qualities of the AONBs to be understood and valued.</b><br><br>The example of greater recreational use seems superfluous and could be read to ignore the need to manage access better - rather than simply increasing volumes.  |
| 4.64                 | Support; suggest rewording of 2 <sup>nd</sup> sentence to better reflect CROW Act (2000):<br><b>The aim will be to conserve and enhance the natural beauty of the designated landscape whilst recognising the social and economic needs of local communities.</b>   |
| 4.65                 | There is a lack of clarity in the phrase "at a scale above the needs of the people who live and work in the area". Perhaps this paragraph could be reworked to add greater definition to 'major development' as stated in NPPF Para 116.<br><br>As with 4.59 & 4.60, wherever there is reference to demonstrating that development is in the public interest there should also be reference to the need to demonstrate exceptional circumstances.   |
| POLICY 4<br>p 66     | See comment ref pp 50-55 above: restructuring the chapters would require separating the policies relating to landscape from those relating to wildlife.   |

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|-------------|--|
|             | <p>Typo: AONB is referred to as ANOB</p> <p>The policy statement with specific reference to AONBs seems limited and potentially weak, particularly having given the nationally-important landscapes a thorough introduction. We suggest clearer, stronger policy statements along the lines of:</p> <ul style="list-style-type: none"> <li>• <b>The plan area's exceptional landscapes will be protected, taking into account the objectives of the AONB Management Plans</b></li> <li>• <b>Development which would harm the natural beauty of the AONBs including their characteristic special qualities, will not be permitted.</b></li> <li>• <b>Development should be located and designed so that it does not detract from and, where reasonable, enhances the local landscape character. Any development that would otherwise have an adverse impact on the landscape of the area will only be acceptable if the impact will be adequately mitigated.</b></li> </ul> |
| 6.12        | Having identified "increased equine development" as a source of landscape impacts in 4.63, its inclusion in the second bullet (as supported by the District) should be removed or at least expressed in a more nuanced fashion to reflect its potential to harm the landscape.   |
| 6.14        | Support  |
| 6.34        | Excellent! Support   |
| 7.50        | Should include mention of the potential to place underground the electricity distribution lines which have greatest negative impact on the area's protected landscapes. This does not include high-voltage transmission managed by National Grid. For more information see <a href="http://www.dorsetaonb.org.uk/our-work/tranquillity-dark-skies/140-undergrounding">http://www.dorsetaonb.org.uk/our-work/tranquillity-dark-skies/140-undergrounding</a>   |
| POLICY 13   | <p>Transportation f: strongly support</p> <p>This policy could be more complete if considerations of the Dorset Rural Roads Protocol were mentioned. Additionally under 'public realm' it isn't just artwork that can enhance the streetscape - sensitive streetscape design using the principles of shared space can influence driver behaviour (making roads safer) while enhancing the environment.</p> <p>Details for both can be found under:<br/> <a href="http://www.dorsetaonb.org.uk/our-work/rural-roads/dorset-rural-roads-protocol">http://www.dorsetaonb.org.uk/our-work/rural-roads/dorset-rural-roads-protocol</a><br/> <a href="http://www.dorsetaonb.org.uk/our-work/rural-roads/traffic-in-villages-toolkit">http://www.dorsetaonb.org.uk/our-work/rural-roads/traffic-in-villages-toolkit</a></p>   |
| POLICY 15   | Support. We welcome the forthcoming development of a Green Infrastructure Plan and would like to be involved either as a consultee or providing advisory input via working group.  |
| 8.18        | Support this approach - however we would appreciate the landscape impact assessment being referenced as a footnote - and being available to the public.  |
| 8.23        | Development within or affecting an AONB should be of high design quality and in keeping with the surrounding landscape character.  |
| Fig 8.1     | We suggest the AONBs are shown as overlaid hatching in order that other features can be seen to be within or without the designation.  |
| 10.15-10.19 | We suggest inclusion of the need for developers to have assessed alternative sites and alternative ways of achieving the outputs of the proposed development if harm to the landscape has been identified as possible.   |
| 10.18       | Suggest addition of "AONB landscape character assessments" as another example of more detailed characterisation  |
| POLICY 22   | Mitigation: suggest inclusion of an assessment of alternative sites and alternative methods where possible harm to the landscape has been identified.  |
| POLICY 24   | Support  |
| 10.79-10.85 | Support: dark skies are ones of the Dorset AONB's special qualities, easily eroded by insensitive lighting schemes even those implemented some distance from the designated area itself.   |
| POLICY 25   | Support.   |
| 10.143      | Support.   |
| POLICY 28   | Support (particularly points e, f, j)  |
| POLICY 31   | Support  |
| POLICY 32   | General criteria should include a bullet with reference to any proposed development being in keeping with landscape character in terms of situation, scale and materials.  |
| p349        | We support the monitoring targets particularly with reference to AONBs   |

3: Not qualified to comment

4: Not qualified to comment - however we believe the plan would be improved by amendments in line with those suggested above.

5: n/a

6: n/a

- 7: n/a  
8: No  
9: n/a  
10: No comments  
11:  That the Local Plan Part 1 has been submitted for independent examination  
 The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1  
 The adoption of the Local Plan Part 1.

Yours sincerely



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Tom Munro MSc MCIEEM  
Dorset AONB Manager