RESPONSE TO DORSET COUNCIL LOCAL PLAN CONSULTATION: Policy Statements COM, ECON, ENV, HOUS

(To be considered by Planning & Environment Committee on 1 March 2021)

COM Policy Statements: Community Infrastructure

Policy Statement	Town Council Response
COM1. Making sure new development makes suitable provision for	
community infrastructure	
 Where new development will generate a need for new or improved community infrastructure, and this need is not met through the Community Infrastructure Levy, suitable provision should be made on-site in larger developments or, if not practicable to do so, by means of a financial contribution. The provision should be appropriate to the scale and needs of the development having regard to: existing facilities in the area, including the quantity and quality of provision; the economic viability and the need for the development; the ongoing maintenance requirements. Community infrastructure will be phased to come forward in advance of, or at the same time as the development when negotiated through planning obligations. When delivered through the Community Infrastructure Levy, such provision will be expected to take place as soon as reasonably practicable after the funds are collected. Contributions will not be sought from new community facilities or affordable housing, with the exception of site-specific measures necessary to make that development acceptable. 	The Town Council does not accept that economic viability should be used as an excuse to avoid paying for essential community infrastructure. If a development cannot deliver essential community obligations it should not be approved. The viability test presents an open opportunity for developers to deliver housing on which they can profit but which makes no contribution to the needs of a community. There should be a requirement that any off site delivery is approved by the local parish authority, to avoid a developer sponsoring a community scheme that is not a local priority.

Q: Policy COM1 sets out the approach that the council will take to ensure that new development meets its infrastructure needs through planning agreements and the Community Infrastructure Levy (CIL). Do you have any comments on this policy?

COM2. New or improved local community buildings and structures Local community buildings or structures will be supported within or adjoining an existing settlement. Development in the countryside may be permitted on well related and accessible sites where the proposal meets an identified community need and:

- no suitable sites or premises exist within or adjoining the relevant settlement; or
- there are overriding community, amenity and environmental benefits derived from the proposed location. Proposals for new, replacement or improved local community buildings or structures must:
- be of a scale and function compatible with the location and appropriate to its role within the settlement and retail hierarchy; and not have unacceptable impacts on local amenity, highway network, the natural or built environment; and
- be well-located in terms of accessibility to their main catchment population, enabling active travel, and not generate significant additional single purpose trips by private car. The council will respond positively to applications for the improvement, expansion, appropriate multi-use or colocation of facilities where this would enhance their viability or ensure their continued use. Where practicable, the design of community buildings should allow for a range of current and future uses.

Q: New or improved local community buildings and structures

1: Do you agree with the suggested approach and what it is trying to achieve?

We note the comments in the main document at 6.3.3 'Where possible, facilities should be located on public transport routes and should avoid generating significant additional car based trips by facilitating opportunities for active travel, including pedestrian and cycle routes.'

Dorchester has been left behind in the provision of cycle routes and public transport. Although it is recognised that the policy should be implemented, Dorchester requires improvements in the provision of public transport and cycle routes to be implemented to ensure that it does not lose out on the provision of improved local community buildings and structures.

2: Do you agree with the	suggested wording?
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3: How could the paragraph / policy / section / chapter be amended to reflect your concerns?

COM3. Retention of local community buildings and structures

- I. Development, including change of use, which results in the permanent loss of local community buildings or structures (including where the most recent lawful use was as a community use), will not be permitted unless:
 - in the case of facilities not run as commercial businesses, it can be demonstrated that there is no local need for the facility or it is no longer practical to continue the existing use; or
 - in the case of commercial community facilities, such a facility is no longer viable; or
 - a suitable replacement is provided in an equally accessible location to serve the local community.

Preference will be given to the change of use or redevelopment to appropriate alternative community uses. Uses other than community uses should be justified with consideration given to whether alternative community uses to meet local needs are not required, suitable or viable.

- II. The council will look favourably on applications which would:
 - diversify and support the continuation of the existing community use (for example the change of part of the site to maintain the original use in a viable form); or
 - help meet identified development needs through the more effective use of sites / premises while maintaining or

The Local Plan document should be refocused on development that sustains and creates vibrancy in smaller settlements, such that these facilities are not lost, which in turn results in extended journeys to access such facilities elsewhere.

Accessible should always mean within the development, not on the edge or beyond its boundaries. The walking distances in the main document at figure 6.3 should be enshrined in policy.

New developments should be designed to complement existing buildings including community based facilities.

improving the existing community service provision (for example through a community hub).

Q: Policies COM2 and COM3 deal with the provision and retention of community buildings and structures. Do you have any comments on these policies?

COM4. Recreation, sports facilities and open space New or Improved Facilities

- Residential development should make provision for formal and informal recreation, play, sports and/or open space facilities onsite. The provision should be appropriate to the scale and needs of the development, having regard to existing facilities in the area, including the quantity and quality of provision.
- II. Where it can be evidenced that on-site provision would not be practicable, the council will consider financial contributions to provide and/or enhance existing facilities off site.
- III. Proposals for new or improved recreation, sports and open space facilities will be permitted where:
 - the proposal would be well-located to be accessible to its main catchment population enabling active travel and would not generate significant single purpose trips by private car; and
 - the proposal would not undermine the commercial viability of nearby community facilities which may be better placed to service the needs of the surrounding community; and
 - the proposal demonstrates a creative concept and high quality design, is deliverable and provides for ongoing maintenance.
- IV. Proposals for new or enhanced recreational facilities away from settlements at the coast (including marine based recreation) or in

There should be a requirement that any delivery is approved by the local parish authority, to avoid a developer providing unsuitable facilities that suit the development of the land holding but are not a local priority.

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

the countryside will only be permitted if they require a coastal or countryside location and their scale is in keeping with the surrounding environment. Such proposals must not:

- be intrusive in the landscape;
- adversely affect land or marine conservation;
- cause unacceptable impacts to local amenity; or
- cause unacceptable increased vehicle movements.

Safeguarding Existing Facilities

- V. Development on, or a change of use to, open spaces of public value and recreational facilities (including school playing fields), or proposals resulting in the loss of built sports and recreational facilities, will not be permitted unless:
 - the development proposed is ancillary to the use of the site
 and the proposal will either support or improve the
 recreational and amenity value of the site, or does not
 adversely affect the number, size or quality of playing pitches
 or their use; or
 - the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the open spaces and recreational facilities (including school playing fields); or
 - alternative and/or suitable replacement outdoor or indoor provision of equal or better recreational quality or value is provided in a location which is suitable to meet any deficiency in provision, and/or better placed and accessible

- to the surrounding community it serves, and there is a clear community benefit; or
 it can be demonstrated that the open space, buildings or land are surplus to requirements, and there is no need for alternative open space of public value or recreational uses
- **Q:** Policy COM4 sets out requirements for provision of recreation and sports facilities and open space provision. Do you have any comments on policy COM4?

which could reasonably take place at the site.

COM5. Hot food takeaways

- Proposals for new hot food takeaway outlets will not be permitted within a 400m radius of a school; other educational establishment; play area; skate park; leisure centre or youth centre.
- **Q:** A policy is being proposed to restrict hot food takeaways within easy walking distance of schools and other places where young children congregate. Do you have any comments on Policy COM5?

While we are not opposed to the principal, as written this policy prevents any new hot food takeaway outlets in Dorchester (See Map below) and would presumably also make takeaways impossible on the proposed DOR13 site. If that is the aim it should be stated more clearly; if not the radius will need to be reduced significantly, to a level where it becomes meaningless.

This policy is probably not workable in an urban community and, due to the decline in retail, would also prevent empty retail units from being converted.

COM6. The provision of education and training facilities

- Proposals for the provision of new / replacement facilities or the expansion of existing education and training facilities will be supported, provided that:
 - the location is well linked in terms of accessibility to the local catchment (taking into account how this may change through the development of strategic housing sites); and

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

any loss of facilities consequential to the development is re-	
provided to the same or higher standard.	
Q: Policy COM6 supports provision of education and training facilities	
subject to a few criterion. Do you have any comments on Policy COM6?	
COM7. Creating a safe, efficient and low carbon transport network	
I. New development should be located in accordance with the	I. The Town Council believes that DOR13 fails this policy statement. As
settlement hierarchy to facilitate the move away from car	such it should be removed from the Local Plan.
dependency and towards healthy, lower carbon travel choices	
and lifestyles. Significant new developments should therefore be	
located close enough to existing facilities or deliver viable new	
facilities to make walking and cycling a realistic choice.	
II. If viable new facilities cannot be provided, high quality public	
transport connections should be provided as part of the	
development. All development should:	II. Based on extensive experience across Dorset the Town Council has no
 be in the most accessible locations, reducing the need to travel 	confidence in the delivery of viable public transport in the long term. This
by car and creating opportunities for healthy lifestyle choices;	policy statement is unrealistic and should be removed; developers should
 support the provision of local services and facilities reducing 	not be given an option to build on sites such as DOR13 that are remote
reliance on the car;	from existing community facilities
 support active travel, building in high quality design principles 	
which prioritise walking and cycling above other modes, and	
expand the strategic and local cycle and Public Rights of Way	
networks;	
 be well connected in a safe manner to the strategic road and 	

rail network;

seek to reduce traffic impacts on the community, especially	
but not restricted to severance, air quality, and the efficiency	
of the transport network, particularly public transport.	
Development will not be permitted where impacts	
(individually or cumulatively) are likely to be severe.	
COM8. Parking standards in new development	
Development will be permitted provided that:	A review of the local parking guidance should be undertaken to ensure it is
I. provision for residential and non-residential vehicle and cycle	compatible with both current and future vehicle ownership trends. On the
parking is made in accordance with the council's published local	one hand it makes no sense to underprovide for parking needs; on the
parking guidance, unless a different level of provision can be	other hand there is a strong likelihood going forwards that car ownership
justified by local or site-specific circumstances;	trends will change significantly.
II. provision for parking for people with impaired mobility is made in	
accordance with the council's published local parking guidance;	
III. provision for motorcycle parking is made to a level appropriate	
for the size and location of the development, having regard to the	
council's published local parking guidance.	
COM9. Provision of infrastructure for electric and other low emission	
vehicles	
I. Development proposals which include parking facilities or which	
are likely to generate vehicle movements or vehicle ownership	
will be expected to integrate the provision of infrastructure to	
enable the charging of electric or other ultralow emission vehicles	
into the design and layout of the development.	
Residential Developments	II 'will be expected to' should be shanged to "must"
II. Residential developments will be expected to include	II. 'will be expected to' should be changed to "must"
infrastructure suitable for charging electric or other ultra-low	
emission vehicles according to the following standards:	

- for all residential development with communal off-street parking provision, at least 20% of car spaces will be expected to include active charging facilities and passive provision for all remaining spaces with the layout of the car park ensuring that all spaces can be activated as demand increases; and
- III. for minor residential development (all developments of less than 10 dwellings):
 - passive infrastructure provision for each dwelling.
- IV. for major residential development (all developments of 10 dwellings or more):
 - at least 20% of dwellings will be expected to have active charging facilities, and the remaining 80% of dwellings will be expected to have passive provision; and
 - at least one rapid charging point clustered with a fast charging point for every 10 car spaces provided, or in accordance with local published guidance; and
 - where appropriate, the provision of an electric or ultra-low emission car club, with its own dedicated spaces including active charging facilities.
- V. In circumstances where off street parking is not provided within a residential development proposal, the design and layout of the development will be expected to incorporate infrastructure to enable the on-street charging of electric or other ultra-low emission vehicles to occur safely.

Non-residential Developments

We are not experts in this subject and do not fully understand the difference between active and passive charging. Given the national commitment to move to electric vehicles, however, this number appears insufficient. Does it enable 100% of vehicles to be electrically charged in 2050? If not it needs to be strengthened to ensure this is the case.

VI. In all non-residential developments providing 1 or more car parking spaces, ducting should be installed to enable provision of charging facilities for electric or other ultra-low emission vehicles.

VII. Where 10 or more car parking bays are provided, at least 20% of those bays are required to provide active charging facilities for electric or other ultra-low emission vehicles, and passive provision is required for all remaining bays.

VIII. In major non-residential development where provision is required for taxi waiting, the taxi spaces will be expected to include active charging facilities.

Q: Policy COM9 sets out criteria for provision of infrastructure for electric vehicles at new development. Do you have any comments on Policy COM9?

Ditto this requirement. The requirement should support 100% of vehicles being able to recharge when present on the site. 20% seems a low figure.

COM10. Low carbon and renewable energy development

- I. Proposals for generating heat or electricity from renewable energy sources (other than large scale wind energy) will be allowed wherever possible providing that the benefits of the development, such as the contribution towards generating renewable energy, significantly outweigh any harm. In addition, permission will only be granted provided:
 - any adverse impacts on the local landscape, townscape can be satisfactorily assimilated;
 - the proposal minimises harm to residential amenity by virtue of noise, vibration, overshadowing, flicker, or other detrimental emissions, during construction, operation and decommissioning;

The Council very much welcomes the sentiment of this proposal and advocates it being applied with immediate effect, rather than waiting for the Local Plan process to conclude. The policy should be rewritten to sound more positive and constructive.

- adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are satisfactorily mitigated.
- any harm to the significance of a heritage asset (including its setting) is less than substantial.

Q: Policy COM10 sets out criteria for provision of infrastructure for low carbon and renewable energy development. Do you have any comments on Policy COM10?

Q: The locations identified as opportunities for larger scale wind developments are shown on Figure 6.5 and Figure 6.6. 1. Do you support the principle of allocating any of the areas for wind turbines?

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

Is there a clear definition of what a substantial harm might be – our experience regarding the Municipal Buildings, a Grade 2* listed structure, demonstrated that heritage is still being given priority over the climate emergency, even though the visual impact is negligible and the physical impact even less.

One issue with the proposals map is that generally the communities that are being asked to accept the intrusiveness of wind farms do not need the capacity being generated. There is clear evidence that in a search for the most financially advantageous options, operators often propose masts that are wholly out of proportion to the landscape, especially as they are often sited on high ground. Placing a strict limit on the height of turbine blades, at say between 50 – 80m, is likely to make them more acceptable to local communities.

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

COM11. Small scale wind energy development

I. Proposals for small-scale wind energy development up to a maximum of 15m to the hub will be supported where it can be demonstrated to be community-led or is set out within an area defined as being suitable for wind energy development within a made neighbourhood plan. In addition, permission will only be granted provided:

This statement, with its conditions, is very much welcomed

- any adverse impacts on the local landscape, townscape or areas of historical interest can be satisfactorily assimilated;
- the proposal minimises harm to residential amenity by virtue of noise, vibration, overshadowing, flicker, or other detrimental emissions, during construction, its operation and decommissioning;
- adverse impacts upon designated wildlife sites, nature conservation interests, and biodiversity are satisfactorily mitigated;
- all impacts on air traffic safety, radar and telecommunications have been adequately mitigated;
- cumulative landscape character and visual impacts with any operational, consented and proposed development neither results in significant coalescence nor becomes a defining characteristic of the wider fabric, character and quality of the landscape; and
- following public consultation all material planning impacts identified by affected local communities have been adequately addressed.

Q: Policy COM11 deals specifically with small scale wind energy developments. Do you have any comments on Policy COM11?

COM12. The provision of utilities service infrastructure

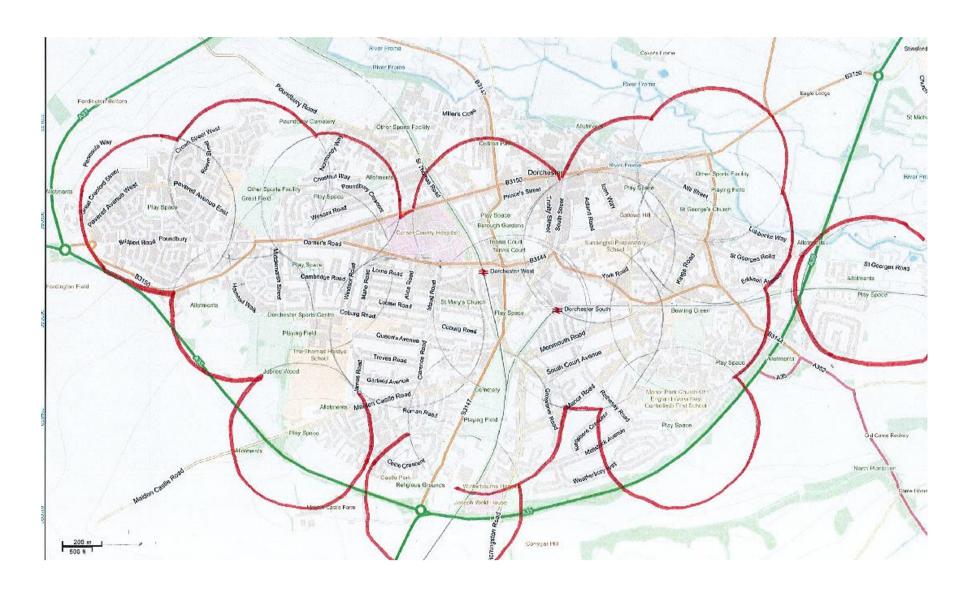
I. Development will not be permitted where the problems associated with the lack of necessary utilities service infrastructure, including energy supplies, drainage, sewerage, sewage treatment and water supply, cannot be overcome.

- II. Proposals for the development of telecommunications or radio equipment will be permitted provided that:
 - the development will not be unduly detrimental to the appearance of the locality, particularly in sensitive areas of landscape, nature conservation or townscape importance; and
 - the applicant has demonstrated that there is a need for the technology, that all technically feasible alternatives have been explored, and that the application proposal results in the least visual harm.
- III. All new residential and commercial developments should provide the infrastructure required to enable connectivity to the highspeed electronic communications network unless it is not practical to do so. For major developments (10+ dwellings or sites of greater than 0.5 hectares) this should be through direct fibre to the premise (FTTP) access.

Q: Policy COM12 supports the need for higher quality broadband provision. Do you have any comments on this?

For sites with more than 2 dwellings, delete 'unless it is not practical'. This is now an essential requirement

COM 5: TAKEAWAYS - IMPACT OF POLICY ON NEW TAKEAWAYS IN DORCHESTER



ECON Policy Statements: Economy

Policy State	ement	Town Council Response
Within (exist the policies I. employed prejude employed policies II. develor sui ger permit substati III. other employed will not Q: Do you h	extection of key employment sites sting and/or proposed) key employment sites (as identified on map): syment uses (defined in Figure 4.1) will be permitted ding they are appropriate to the location, would not dice the efficient and effective use of the remainder of the syment site, and are in accordance with other planning	Clarification is sought on whether ECON1 applies only to light industrial, ie not to other classes including retail, offices and other employment sites. The Council supports the approach for the following Employment sites Marabout/Grove, Poundbury West, Railway Triangle Allington Industrial Estate Casterbridge Trading Estate Poundbury Mixed Use The Council has commented separately on Poundbury Mixed Use (DOR6) and Parkway (DOR7) and North of Dorchester (DOR13). The Council has also commended separately on policies DOR2-DOR5 covering town centre retail, where it wishes to see a pragmatic solution for unused retail based on an overall town centre masterplan. II: While acknowledging the need to find alternative commercial uses, as worded the statement risks the loss of commercial sites to nonemployment use, to which the Council is opposed unless part of a fuller masterplanning exercise and with consideration of compensating provision of employment land elsewhere.
I. Outsic of B2, premis	de the key employment sites. B8 or similar Sui Generis employment land and/or ses will be permitted in accordance with other planning es where:	The Town Council agrees with the approach but also invites consideration that the policy should also be extended to Retail (E) class premises. As with ECON1 we have significant concerns that commercial land will be lost. Protecting a site's use for employment is often not in the best financial interests of developers.

- Development comprises suitable alternative employment uses (defined in Figure 4.1); or
- the mixed use redevelopment of the site would deliver important benefits with no significant loss of jobs / potential jobs; or
- the present (or where vacant or derelict, the previous) use causes significant harm to the character or amenities of the surrounding area and it has been demonstrated that alternative employment uses are not suitable or achievable; or
- it has been demonstrated that no viable employment use could be attracted to the site which has been actively and realistically marketed for re-use / redevelopment for employment use for a suitable period of time and reflecting the market value.

Redevelopment of employment sites must not adversely impact upon the amenity and operation of neighbouring properties/businesses and must be appropriate to the location.

Q: Do you have any comments on the approach to the protection of non-key employment taken by policy ECON2? Should the scope of the policy be extended beyond B Class uses to also safeguard 'employment' development as defined in figure 4.1?

Q: Do you agree with the classification of the centres in the proposed hierarchy?

Should any be reclassified or deleted? Are there any additional centres that should be included?

- I. Town, district and local centres (identified in Figure 4.2) are the focus for town centre uses. Their vitality and viability will be strongly supported and promoted through planning decisions.
- II. New centres will be supported where they are of a scale and type to serve local needs and do not adversely affect the vitality and viability of any centres.
- III. In order to sustain and enhance the vitality and viability of centres, new proposals for town centre uses will be permitted in accordance with the sequential approach as set out in Figure 4.3. Development will be directed firstly towards 'in-centre' locations, followed by 'edge-of-centre' locations. Only if no town centre or edge of centre locations are available, should 'out of- centre' sites that are, or will be, well served by a choice of sustainable modes of transport be considered.
- IV. Applications for town centre uses that do not pass the sequential test will be refused.
- V. The sequential approach will not be applied to applications for small-scale rural development (including offices), rural tourism, small-scale community facilities or trade-related uses on employment sites.

ECON4: Town centre impact assessments

I. Proposals for retail and leisure development above minimum local gross floorspace thresholds, in locations outside of the town centre areas shown on the policies map are required to submit an impact test to support the proposal.

Supported

The retail parade of shops in Maud Road, Dorchester should be recognised as a local centre

How does Dorset Council intend to provide protection for the mixed use approaches at Poundbury, particularly Buttermarket and Pummery Square?

II.	Development likely to lead to a significant adverse impact on
	existing centres will be refused.

Q: Do you have any comments to make on Policy ECON4?

Q: In view of the recent creation of Use Class E with the increase in flexibility of changes of use to take place without the need for planning permission, should primary and/or secondary retail frontages still be defined?

The word significant should be removed or carefully defined. Our town centre is increasingly unable to sustain even modest impacts of new out of town development

ECON5: Management of centres, primary shopping areas and markets

- I. The boundaries of town centre areas and primary shopping areas are defined on the Policies Map.
- II. Development proposals for town centres uses will be supported if of a type and scale appropriate to the size, role and function of the centre.
- III. Development proposals for retail and other town centre uses in primary shopping areas will be supported where:
 - a positive contribution is made to the vitality, viability and diversity of the primary shopping area and centre; and
 - an active ground floor use is maintained or provided.
- IV. New or relocated markets should be directed towards the primary shopping areas in prominent and accessible locations. Proposals that prejudice the future operation of existing markets should be refused.
- V. Public realm improvement measures intended to enhance the vitality of centres and to increase footfall are encouraged.
- VI. The use of upper floors of premises in centres for residential or other uses will be encouraged subject to the ground floor use not

While we are supportive of this approach in principal the impacts for Dorchester town centre of changes to shopping habits accelerated by the Covid lockdown need to be fully evaluated. The long term plan for the future of Dorchester town centre, including its key retail spaces, needs to be fully and urgently reviewed.

We would not wish to deter conversion of premises to non-retail uses provided it is not detrimental to the primary shopping area. The Town Council recognises the need to bring additional footfall to the town centre and also to deliver alternative housing capacity sufficient to remove the threat of DOR13

This should be undertaken before any proposals for out of town residential or retail are considered

being undermined and, where possible, separate access to the upper floors being provided.

VII. Planning conditions and / or planning obligations will be used where necessary and justified to prevent town centre uses being located outside centres and to maintain the predominant retail function of primary shopping areas.

The words "subject to" undermines the reuse of upper floor spaces and should be removed

Q: Retail

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

With the retail market undergoing rapid change this policy needs to be kept under regular review

ECON7: Loss of tourist accommodation

- I. Proposals that would lead to the loss or reduction in size of a hotel or other accommodation in Use Class C1 will only be permitted:
- II. where the proposal would affect five or fewer lettable bedrooms or facilities available to residents, and the loss would not affect the ongoing viability, attractiveness or operation of the retained tourist accommodation; or where it has been demonstrated that the existing use is not viable and there is no market interest in acquisition or investment to allow the continued profitable operation of the business.

We are concerned that developers may deliberately allow viable tourist accommodation, as well as pubs and wider hospitality premises, to become derelict in order to ease permission to convert to other purposes

- III. Larger tourist attractions, facilities and built accommodation should locate within town centres, followed by edge of centre locations before out of centre sites are considered (in accordance with policy ECON3). Tourism development above the thresholds established in policy ECON4 should provide an impact statement and transport plan.
- IV. Outside development boundaries, tourism development will be required to:
 - demonstrate that the countryside location is essential, the development is viable in the long-term and would benefit the local economy; or
 - comprise the reuse or replacement of a rural building (in accordance with policy HOUS9); or
 - comprise alteration or extension to improve existing tourism development and enhance the appearance of the site; or
 - be part of a diversification scheme for land based rural businesses (in accordance with policy ECON10)
- V. All proposals must be of a scale, type and appearance appropriate to the location.
- VI. Development needs to be sympathetic to the wider environment and must not result in an adverse impact, individually or cumulatively, upon designated landscapes and sites of biodiversity importance.
- VII. Development that results in harmful impacts on local services, roads and other infrastructure will not be permitted.

In supporting this policy the Town Council again reiterates the urgent need for a masterplan that considers the future of the town centre.

VIII Dovolonmo	t to onbanco the visitor oconomy and increase
VIII. Developmer	t to enhance the visitor economy and increase
the quality and	liversity of the tourism offer in the local area will
be supported. P	oposals that deliver a wider environmental or
community ben	efits will be encouraged.
Q: Do you have any	comments on the approach taken by policy
ECON7 to the lo	ss of tourist accommodation?
Q: Do you think im	portant areas of highly concentrated serviced
tourist accommo	odation should be designated and afforded
additional prote	ction?

ENV Policy Statements: Environment

Poli	cy Statement	Town Council Response
EN\	/1: Green infrastructure: strategic approach	
l.	The primary function of any element of the green infrastructure network will be protected from the adverse impacts of development and, where appropriate enhanced by relevant policies in the development plan.	To deliver the policy it will require specific sites and hedges to be designated in as many cases as possible. Inter-site connectivity is entirely missing from this section.
II.	Developers will be expected to incorporate enhancements to any element of the green infrastructure network which performs, or could perform, other functions to deliver multifunctional green infrastructure benefits in accordance with relevant Local Plan Policies.	ii. Should be phrased 'Developers MUST incorporate enhancements to any element of green infrastructure'
III.	 Any strategic development site should include provision of sufficient green infrastructure to serve the site itself and, where suitable opportunities exist, strengthen the existing green infrastructure network for example by: enhancing and connecting cycling and walking provision between local facilities, local open spaces and where appropriate, the countryside; connecting together and enriching biodiversity and wildlife habitats; and improving connections, green corridors and links between different components of the green infrastructure network. 	iii. Should be phrased 'Any strategic development site MUST include provision of sufficient green infrastructure'
IV.	Any new green infrastructure provided as part of a development scheme, or any new elements of green infrastructure identified in neighbourhood plans (including local green spaces), will form part of the green infrastructure network.	
V.	Development proposals must make adequate provision for the long-term management and maintenance of the green infrastructure network.	

Q: Green infrastructure: strategic approach	
1: Do you agree with the suggested approach and what it is trying to	
achieve?	
2: What about the suggested policy wording?	
3: Could any amendments improve the policy or its strategy?	
ENV2: Habitats and species	
International and European sites	
I. Proposals for development must not adversely affect the integrity	The policy needs strengthening to ask more of developers.
of International or European sites either alone or in-combination	
with other plans and projects, unless the tests set out under the	
Conservation of Habitats and Species Regulations (2017) (as	
amended) are met. Where adverse impacts are identified	
measures must be put in place to avoid, mitigate or compensate	
these impacts. Adverse impacts that cannot be avoided or	
adequately mitigated will not be permitted other than in	
exceptional circumstances. These circumstances only apply where:	
there are no suitable alternatives;	
• there are Imperative Reasons of Overriding Public Interest; and	
 necessary compensatory provision can be secured to ensure that 	
the overall coherence of the National Site Network of SACs, SPAs	
and Ramsars is protected.	Section (ii) about Poole Harbour needs strengthening from "make
II. Where specific impacts have been identified in relation to	contributions towards" to "make contributions that enable"
particular sites, mitigation	
measures for these sites will include:	
In relation to Dorset Heaths SAC, Dorset Heaths (Purbeck and	
Wareham) and Studland Dunes) SAC and Dorset Heathlands	
SPA/Ramsar, contributions from development within 5km of the	
heathland designations towards the sustainable management of	
the heathland sites or contributions towards the provision of	
suitable alternative natural greenspace (SANG)	
, ,	
In relation to the Poole Harbour SPA/Ramsar,	

- contributions towards the effective management of the site to reduce eutrophication from additional nitrates arising from development,
- contributions towards the effective management of the site to reduce recreational pressure
- In relation to Chesil and the Fleet SAC and Chesil Beach and the Fleet
- SPA/Ramsar, contributions towards the effective management of the site to reduce recreational pressure or contributions towards the provision of suitable alternative natural greenspace.
- In relation to Fontmell and Melbury Downs SAC, Cerne and Sydling Downs SAC and Rooksmoor SAC, contributions towards measures to reduce aerial nutrient deposition arising from increased traffic linked to new development.
- In relation to Somerset Levels and Moors SPA/Ramsar, River Avon SAC, Avon Valley SPA/Ramsar and the River Axe SAC, contributions towards measures to reduce increased levels of phosphate arising from development.

National sites (SSSI and NNR)

III. Proposals for development which do not adversely affect the integrity of International or European sites or other internationally designated sites, but which are likely to have an adverse effect on a national site (whether the development is within or outside the site) will not normally be permitted. The only exception is where the benefits clearly outweigh both the impacts on the special features of the site and broader impacts on the national network of sites. In these circumstances,

III Should read "compensation must result in"

development will only be permitted where it can be shown that adverse impacts on biodiversity will be:

- Mitigated, or
- Where adverse impacts cannot be adequately mitigated, compensation will result in the maintenance or enhancement of biodiversity.

Local sites (SNCIs, LNRs)

IV. Local sites will be safeguarded from development through use of the mitigation hierarchy with avoidance as the preferred approach. This is in recognition of their intrinsic value for rare and threatened habitats and species, and their role in the wider ecological network where they function as wildlife corridors and stepping stones. Where impact is unavoidable, developers must provide mitigation or, as a last resort, compensation in the form of replacement habitat in a suitable alternative location to ensure there is no net loss of biodiversity, as set out in Policy ENV2. Where this last option is used, funding will be secured to enable management of the replacement site for at least 30 years.

Protected species

- V. Adverse impacts on European Protected Species and UK protected species must be avoided wherever possible subject to the legal tests afforded to them and where applicable, unless the need for or benefits of development clearly outweigh the loss. In all cases the mitigation hierarchy must be applied.
- VI. Development that is likely to have an adverse effect on a European Protected Species will only be permitted if:
- there are reasons of overriding public interest why the development should proceed, and
- there is no alternative acceptable solution, and

• adequate provision can be made for the retention of the species or their safe relocation

Ancient woodland, ancient and veteran trees, and hedges

- VII. Development resulting in the loss or deterioration of ancient woodland, ancient or veteran trees (or other irreplaceable habitats) will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Proposals that would result in the loss of individual ancient or veteran trees located outside ancient woodlands will be refused on the same grounds
- VIII. The removal of large mature tree species and their replacement with smaller shorter lived species will be resisted.
- IX. Important hedgerows will be given consideration as set out in the Hedgerow Regulations, 1997, and development affecting an important hedge will be expected to avoid impacts in the first instance. 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.

Proposals where the primary purpose is to conserve or enhance biodiversity and deliver a net gain for such objectives will be supported in principle where this accords with other policies in the Local Plan.

Q: Habitats and species

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV3: Biodiversity and net gain

Proposals for development should avoid harm to biodiversity. If significant harm cannot be avoided proposals must incorporate adequate mitigation or (as a last resort) compensation. Where harm cannot be avoided and

Replace "should avoid harm to biodiversity" with 'Must avoid harm to biodiversity.'

adequate mitigation or compensation is not proposed, permission will be refused. I. Development (other than that exempt under the terms of the Environment Bill) must deliver a minimum of 10% net gain in II Remove "where appropriate" biodiversity through the restoration and recreation of habitats forming part of the existing and proposed Ecological Network. II. Wildlife enhancements will be secured where appropriate within the built environment for all scales of development. III. Developments will provide for the long-term monitoring and management of biodiversity features retained and enhanced within the site and for features created off-site to compensate for IV Replace "should seek to be" with "must be" development impacts or to enable delivery of net gain. IV. All new, enhanced and restored biodiversity provision should seek to be an exemplar of best practice and innovation in its design and on-going management. V. Proposals where the primary purpose is to conserve or enhance biodiversity and deliver a net gain for such objectives will be supported in principle where this accords with other policies in the Local Plan. Q: Biodiversity and net gain 1: Do you agree with the suggested approach and what it is trying to achieve? 2: What about the suggested policy wording? 3: Could any amendments improve the policy or its strategy? **ENVV4: Landscape** I. All development should conserve and enhance the landscape and Section 3.5.2 of the main document should be encapsulated into a clear policy statement here. seascape. Development should respond positively to the local and wider context of the proposal site and should avoid adverse impacts on existing features.

II. Where an adverse impact is unavoidable, mitigation measures should be incorporated into the development proposal in order

Replace "should with "must" throughout this section

- to reduce this impact. Mitigation should result in no significant adverse impacts on the landscape or seascape.
- III. Mitigation measures must be appropriate to and make a positive contribution to the character of the landscape / seascape setting of the area. Measures should be adequate and proportionate to mitigate:
 - any adverse impacts on the existing landscape character and key landscape features; and
 - any adverse impacts on visual amenity.
- IV. Development which significantly harms the visual quality or landscape / seascape character and / or fails to take opportunities to conserve and enhance these qualities will be refused.

AONB

- V. Within an AONB, major development will be refused unless there are exceptional circumstances and it can be demonstrated to be in the public interest. Minor development within an AONB or affecting its setting, will only be permitted if:
 - it does not harm the landscape and scenic beauty of the AONB and its setting; and
 - It does not conflict with and contributes towards the aims and objectives of the relevant AONB Management Plan.

Heritage Coast and the AONB

VI. Development within the section of the West Dorset Heritage Coast that lies outside the Dorset AONB will only be permitted if it does not harm the special character of the area. Major development will only be permitted if it is compatible with the special character of the Heritage Coast.

Other valued landscapes

VII. Where development is proposed in an area designated as a valued landscape in the development plan or that possesses the

physical attributes that enable the area to qualify as valued landscape, the impacts of the development on that landscape will need to be weighed against the benefits of the proposal. Developments that have significant adverse Impact on the identified qualities of the valued landscape will be refused.

Q: Landscape

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV5: Heritage Assets

The impact of development proposals affecting heritage assets will be assessed against the significance of the heritage assets being affected.

- I. Development proposals should avoid or minimise harm to the significance of heritage assets, taking into account the contribution of their setting, and ensure that they are conserved in a manner consistent with their significance. Where possible, opportunities to enhance or better reveal significance should be identified and these will be taken into account when assessing the impact of the development proposal.
- II. When considering applications for development that would harm the significance of a non-designated heritage asset regard will be given to the scale of any harm or loss and the significance of the asset. Development will only be permitted if the scale of harm or loss is not outweighed by the significance of the asset.
- III. Direct harm to locally important archaeological remains will not be permitted unless the public benefits demonstrably outweigh their significance. In such cases, a programme of recording, analysis and publication will be required.

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

- IV. Where harm to / loss of a heritage asset can be justified, any lost features should be recorded and their significance assessed and these findings should be made publicly available. Appropriate steps will be taken to ensure the new development will proceed after any justified loss has occurred and to safeguard the structural integrity of any retained or adjoining structures / features.
- V. In exceptional circumstances, a proposal for enabling development may be supported if it would secure the long-term conservation and enhancement of a heritage asset considered to be at risk. Such development will only be permitted if:
 - it can be demonstrated that it would not be possible to secure the long-term conservation and enhancement of the heritage asset in ways that are more consistent with relevant planning policies;
 - it can be demonstrated that the enabling development is the minimum necessary to secure the long-term conservation and enhancement of the heritage asset; and
 - the benefits of the enabling development outweigh the disbenefits of departing from relevant planning policies.

Q: Heritage assets

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV7: Achieving high quality design

I. Development proposals, excluding those without external alterations, should clearly demonstrate the design rationale of

A clear outline of how the principle of good design would be enforced should be incorporated into the policy.

principle consider II. Planning high qua place m III. Permiss	eme. This rationale should demonstrate how the es of good design have been addressed through the ration of the site and its wider setting. It is permission will only be granted for proposals that are of ality and that follow the principles of good design and aking. It is is is a solution will be refused for development of poor design that take the opportunities available for improving the	3.8.9. For strategic housing sites, applicants must submit a masterplan covering the whole site for approval at the first stage. For sites that the Council considers to be particularly sensitive and / or substantial in scale, a Design Code should also be required. The policy should include a statement that the Council will assess development proposals using the design toolkit Building for a Healthy Life (BHL).
characte	er and quality of an area and the way it functions.	
Q: Achieving	g high quality design	
	gree with the suggested approach and what it is trying to	
achieve?		
	out the suggested policy wording?	
3: Could any amendments improve the policy or its strategy		
ENV8: The landscape and townscape context		
	lopment proposals should be based on a clear response	
to the co	ontext of a site, its immediate setting and the surrounding	
built en	vironment and its landscape character and should respect	
and enh	ance the established townscape.	
II. Provisio	n should be made for the retention, enhancement and	
future n	naintenance of features that contribute to an area's	
identity	and distinctiveness.	
III. The sitir	ng and design of buildings (in terms of scale, mass,	
density,	architectural quality and materials) will respect and	
enhance	e the character of the surrounding area, reinforce a sense	
of place	and actively improve legibility and character.	

IV.	Developments should contribute positively to the creation of a
	successful and attractive places through the inclusion of
	appropriate hard and soft design features to integrate into the
	character of the surrounding area.

Q: The landscape and townscape context

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV9: Achieving high levels of environmental performance

 New buildings and alterations / extensions to existing buildings are expected to achieve high standards of environmental performance.

Q: Achieving high levels of environmental performance

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV10: Shop fronts and advertisements

 High quality design and materials in shop front development are expected. Proposals for new or replacement shop fronts, including associated features will normally be permitted if they are compatible with the character and heritage of the area and of the building. The statements in paragraphs 3.10.2 - 3.10.5 of the main document should be incorporated into the policy statement.

In light of the Government's policy to end the of sale of new petrol and diesel cars by 2030, a requirement that all new developments should include electric vehicle charging points should be included in this policy.

The main document text should be revised

3.10.4 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.

3.10.5 Methods which will be expected

Add "by inclusion of methods suggested in paragraphs 3.10.4 and 3.4.7

In light of the effects of the impact of internet shopping on the retail sector, and most recently the impacts of Covid and Lockdown it is

II. Decisions controlling advertisements will be made in the interests	anticipated that more applications for change of use from retail to
of amenity and public safety.	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
Q: Shop fronts and advertisements	
1: Do you agree with the suggested approach and what it is trying to	
achieve?	be created.
2: What about the suggested policy wording?	
3: Could any amendments improve the policy or its strategy?	
ENV11: Amenity	
I. Proposals for development should be designed to minimise their	
impact on the amenity and quiet enjoyment of existing and future	
residents or users within a development and close to it.	
Development proposals will only be permitted if:	
 they do not have a significant adverse effect on the living 	
conditions of occupiers of residential properties through loss of	
privacy;	
 they do not have a significant adverse effect on the amenity of 	
the occupiers of properties through inadequate daylight /	
sunlight or excessive overshadowing, overbearing impact or	
flicker	
 they do not generate a level of activity, noise or vibration that 	
will detract significantly from the character and amenity of the	
area or the quiet enjoyment of residential properties; and	
 they do not generate unpleasant odours unless it can be 	
demonstrated that the effects on amenity, living conditions,	
health and the natural environment can be mitigated to the	
medicinate the natural environment can be intigated to the	

appropriate standard.

- II. Development which is sensitive to noise, vibration or unpleasant odour emissions will not be permitted in close proximity to existing sources where it would adversely affect the amenity of future occupants.
- III. Proposals for external lighting schemes (including illuminated advertisement schemes) should be clearly justified and designed to minimise potential pollution from glare or spillage of light. The intensity of lighting should be the minimum necessary to achieve its purpose, and the benefits of the lighting scheme must be shown to outweigh any adverse effects.

Q: Amenity

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

ENV12: Pollution control

Development proposals which will cause unacceptable on- or off-site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively, will not be permitted. Development should:

- avoid harmful environmental impacts and health risks for both new and existing development arising from soil, air, water, or land pollution. In particular, impacts on the National Site Network must be avoided, satisfactorily mitigated and, if necessary, compensated in accordance with policy ENV2;
- II. where impacting on an Air Quality Management Area, avoid or mitigate its impact through positively contributing towards the

- implementation of measures to address the air quality issue including through the provision of green infrastructure and through building design and layout;
- III. prevent deterioration of and where appropriate, enhance water quality including in relation to the groundwater resource; and
- IV. where appropriate, remediate contaminated land to reduce risk to acceptable levels

Q: Pollution control

- 1: Do you agree with the suggested approach and what it is trying to achieve?
- 2: What about the suggested policy wording?
- 3: Could any amendments improve the policy or its strategy?

HOUS Policy Statements: Housing

Policy Statement		Town Council Response
НО	US1: Housing Mix	
II. III. Q. I Doe me	New residential developments of all tenures should contribute towards achieving sustainable and balanced communities through an appropriate mix of homes of different sizes, types and affordability. On major residential development sites, at least 20% of all dwellings across all tenures should be provided at the Accessible and Adaptable Dwellings standard as established through building regulations unless robust justification is provided to explain why this cannot be achieved on site. Where specific need for a certain mix of different sizes, types and affordability of homes has been identified through a neighbourhood plan, development proposals should look to meet this need. Housing mix es the proposed housing mix policy provide the right balance between eeting the overall housing needs of the area while offering sufficient	The Housing Mix policy should recognise that there are locations, often in towns, where there has been disproportionate provision of accommodation solely for one group, e.g. for retirement. Where this is the case the policy should be worded to specifically prohibit the development of sites for the same purpose until the local housing mix has been rebalanced. This might be achieved either within the core policy or recognising the right of Neighbourhood Plans to prohibit a specific form of development.
	flexibility for each site? HOUS2: Affordable housing	
I.	Housing on major sites and sites of 5 to 9 net additional dwellings in 'designated rural areas' will contribute to the provision of affordable housing. Such developments should contribute to the provision of affordable housing in the following proportions: • 40% of the total number of dwellings on sites in Zone 1;	Recognising the desperate need for supply of affordable housing this policy should be much stronger. All sites with more than 2 dwelling should set aside at least 1 unit for affordable housing

- 35% of the total number of dwellings on sites in Zone 2; and
- 25% of the total number of dwellings on sites in Zone 3.
- III. In most cases, where one or more affordable homes are being provided, these should be provided on the open market site. Financial contributions towards the provision of affordable housing will be required for any shortfall that cannot be delivered on the site.
- IV. Applicants seeking to justify a lower level of affordable housing provision will be expected to provide an assessment of viability, which should adopt an 'open book' approach and take account of grant funding or any other subsidy. A lower level of provision will only be permitted if the assessment shows that it is not economically viable to make the minimum level of provision being sought and there are good reasons to bring the development forward.
- V. The affordable homes should be provided at:
 - a maximum of 30% (but not less than 10%) affordable home ownership products; and
 - a minimum of 30% social rent; and
 - a minimum of 40% affordable rent.
- VI. The type, size and mix of affordable housing on a development site should help to address the identified and prioritised affordable housing needs in the local area, resulting in a balanced community of housing and/or flats that are 'tenure blind'.

Q: Affordable housing

If a site is capable of being delivered for housing then it is equally capable of being delivered for affordable housing. Financial contributions should never be permitted. Provision must always be made on site, with no exceptions.

The open book approach will often identify that the developer has overpaid for the land, by which point it is too late to renegotiate a more realistic land value.

This policy should not be included as it allows developers a get out clause. Sites which cannot deliver affordable housing consistent with the needs of the community should not be developed.

Affordable homes are consistently much smaller and built to a lower standard than other parts of the development. This policy should require affordable housing to be built to the same type, size and mix as the remainder of the site.

- Self-build and custom-build housing schemes may be permitted on sites within development boundaries or on strategic housing allocations.
- II. Outside development boundaries self-build and custom housebuilding schemes may be permitted:
 - on an affordable housing exception site, in accordance with Policy H5;
 - through the replacement of an existing dwelling, in accordance with Policy
 - HOUS9;
 - through the subdivision of an existing home, in accordance with Policy HOUS9;
 - through the conversion of an existing building, in accordance with Policy DEV8; or
 - as a rural workers' dwelling, in accordance with Policy HOUS8.
- III. A scheme for more than 5 self-build or custom-build dwellings on any site should be developed in accordance with an agreed design code.

Q: It is likely that the council will be able to meet the current identified need for self-build and custom-build housing through the mechanisms identified above. However another option would be for the council to allocate specific sites solely for self/custom build. Views are welcomed on whether the

The Council should NOT allocate specific sites for self-build. The provisions in (i) and (ii) here are sufficient. Any site suitable for more than two houses should be made available for 'normal' development.

Does the Design Code currently exist? If not, will local Councils be consulted during its development? If a Design Code is acceptable for Self-Build, should it also be considered for all development?

council should pursue this approach. Views are also sought on any specific sites which could be allocated for this purpose.

Q: What approach do you think the Council should look to develop to address the pockets of high second home ownership?

Although it is not obvious how this might be achieved the Council would certainly support any approach to reduce the potential for any second home ownership.