

Environment

For the Environment chapter a total of 341 responses were received. The individual comments were broken down as follows:

Number of comments made: 341

Object: 216

Support: 90

Neutral: 35

Specific and general consultation bodies	Key landowners / developers
<i>Bridport Town Council</i>	<i>Dorset Planning Consultant Limited</i>
<i>Burton Bradstock Parish Council</i>	<i>Home Builders Federation</i>
<i>Dorset County Council (Archaeology)</i>	<i>Luxury Family Hotels</i>
<i>Dorset County Council (Children's Services)</i>	<i>Persimmon Homes</i>
<i>Dorset County Council (Environment & Economy)</i>	<i>Persimmon Homes South West</i>
<i>Dorset County Council (Flood Risk)</i>	<i>Portland Harbour Authority</i>
<i>Dorset County Council (Transport)</i>	<i>Portland Port Group</i>
<i>Dorset County Hospital</i>	<i>Symondsburry Estate and The Watton Hill Trust</i>
<i>Dorset Local Nature Partnership</i>	<i>Wyatt Homes</i>
<i>Dorset Wildlife Trust</i>	
<i>Historic England</i>	
<i>Moreton Parish Council</i>	
<i>Natural England</i>	
<i>Portland Town Council</i>	
<i>Public Health Dorset</i>	
<i>Sherborne Town Council</i>	
<i>Wessex Water</i>	
<i>Woodland Trust</i>	

Introduction

General Comments

- Insert a statement on the importance of green spaces within built-up areas to improve wellbeing. These green spaces and old hedgerows provide corridors for wildlife and can be significant in saving endangered species such as the hedgehog.
- Chapter 2 fails to address Dorset's role in reducing CO₂ emissions and supporting renewable energy and the low carbon economy. It is overly focused on preserving the natural environment and protecting landscapes, which although very important, is impossible without simultaneously tackling the threat caused by rising CO₂ emissions. The LPR has failed to incorporate paragraph 151 of the NPPF.

- New development at Weymouth and Dorchester will require the expansion of the A35 between the two settlements in order to avoid major congestion, avoid business loss and health implications. Increased congestion will drive up greenhouse gas emissions.

Section 2.1

- Reference should be made to the Dorset Local Nature Partnership's Strategy and Vision in the introduction. (Dorset Local Nature Partnership)

Paragraph 2.1.1

- This paragraph could be more dynamic with more detail than 'much of the area', 'many wildlife habitats' and 'many buildings'. (Dorset Local Nature Partnership)

Paragraph 2.1.2

- We recommend including reference to the Government's 25 Year Environment Plan and in particular the proposal for "Embedding an 'environmental net gain' principle for development including housing and infrastructure." (Dorset Local Nature Partnership, Dorset Wildlife Trust)
- Policies in the local plan review seek to protect AONB landscapes. Destruction of in excess of 45 hectares of Grade 2 farmland and scenic landscapes at Vearse Farm, Bridport demonstrate that this policy is being contravened.

Paragraph 2.1.3

- We recommend including adapting to increasing temperatures through green infrastructure (green walls / roofs and tree planting for shade). (Dorset Local Nature Partnership, Dorset Wildlife Trust)

Strategic Approach

Support

- Historic England welcomes this proposed strategic approach that acknowledges the importance of the historic environment. (Historic England)
- Amendments to the first paragraph of the strategic approach reflect the NPPF. (Dorset County Council: Ecology)

General Comments

- The North Dorchester proposal flies in the face of the strategic approach.
- The 'strategic approach' reveals WDDC's policy's bias towards the developer, with reference to the Vearse Farm allocation at Bridport, as an example.
- The design of any development particularly in Sherborne to the north of the town should be watched carefully otherwise further expansion will have an adverse effect on the landscape.

Responses to Question 2-i: Policy ENV1 has been revised to provide a clearer framework for assessing how development may affect designated and non-designated landscapes. Do you have any comments on the changes to Policy ENV1?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Natural England, Sherborne Town Council)
- We welcome this strategic policy particularly the encouragement to conserve, enhance or restore locally distinctive landscape features. (Historic England)
- DWT supports this policy and believes it is clearer in defining where and when development will be allowed. (Dorset Wildlife Trust)

General Comments

- The policy should be expanded to include the need to treat the conservation and enhancement of wildlife and cultural heritage as important considerations within the AONB. See NPPF 2018 paragraph 172. (Natural England)
- Is this sufficiently robust against the designations as set out in the new NPPF? (Portland Town Council)
- I do not consider that any new development is necessary or desirable within the AONBs, heritage landscapes and other areas which make Dorset special.
- Far greater sensitivity should be given to the quality and nature of the natural environment. Developments have proliferated in West Dorset particularly that severely and irrevocably undermine the status of the AONB.
- Policy ENV1 appears to now provide a clear framework for assessing how development may affect designated and non-designated landscapes.

New National Park

- Representations should be made to the Glover review to define all of the new unitary Dorset a National Park or an AONB.
- There is a move to create a National Park in West Dorset and beyond, but already the environment is so degraded that surely this ambition is entirely fanciful. Surely localised small developments that are slotted into communities are a better option?

ENV1 Criterion i): Development Within the AONB

- As 74% of the Local Plan area is within the AONB is there a risk that this policy may be used to prevent development? (Dorset County Council: Environment & Economy)
- Given the presence of the Dorset AONB we believe the Councils have grounds for paring back development. We welcome the sentiment in 2.2.2 that landscapes outside national designations are also worthy of conservation and enhancement and agree that 'valued landscapes' should be protected and enhanced.
- Building on the AONB is in direct conflict with the fourth 'strategic priority'. If development is to take place in the AONB we believe that there should first be an open consultation on removing a particular piece of land from the AONB.
- Development within the AONB should be refused 'unless there are exceptional circumstances'. Desire for national and local growth is in no sense exceptional. Natural England and Dorset AONB Partnership disagree that 'exceptional

circumstances' as defined in the NPPF can be triggered solely by a lack of suitable alternatives in the plan area.

ENV1 Criterion ii): Major Development within the AONB

- With reference to Beaminster, which lies entirely within the Dorset AONB, this clause in the policy will result in an excessively restrictive policy framework to enable development in and around the town. It is noted in Paragraph 3.3.4 that major development needs to take place given the need for growth and this is a valid exceptional circumstance within the AONB. (Persimmon Homes South West)
- The AONB is a nationally designated landscape and there is a duty upon local authorities to conserve and enhance through their policies, decision making and the statutory Management Plans. However, given the acceptance that there is a need for growth, and that growth is recognised as an exceptional circumstance, it renders point (ii) unnecessary and it should be deleted. (Persimmon Homes South West)
- Another 'grey' area: 'unless there are exceptional circumstances.' Define.
- Point ii) you have misquoted the NPPF by substituting 'national' for 'public'.

ENV1 Criterion iii): Heritage Coast Outside the Dorset AONB

- The policy areas affected by ENV1 should be reviewed for consistency with the NPPF. Given the above definition, the Councils need to review the policy boundary / designations in relation to the previously developed sites which are within the Heritage Coast areas. The council should seriously consider reviewing the extent of the policy boundary so as to reflect the built and un-built elements of the Heritage Coast. (Persimmon Homes)

ENV1 Criterion iv): Valued Landscapes

- Para 2.2.10 – 2.2.12: In respect of 'valued landscapes' these paras. are an important introduction and should very much be maintained in the final version of the LP.
- Para 2.2.10 – 2.2.11: This section should include a paragraph on what sanctions the council will use if these landscapes are ruined by inappropriate or unauthorised development causing a loss of the special nature of the landscape.
- ENV1 iv): change 'will' to 'should'. (Portland Port Group, Portland Harbour Authority)
- Valued landscapes should also include Local Green Spaces. (Dorset Planning Consultant Limited)
- Criterion iv) is subjective and open to interpretation. The council should produce a map identifying land that falls into this category and give examples of the tests they will use to measure the attributes they refer to. These landscapes of value have different vistas from different angles.

ENV1 Criterion v): Development Outside the Dorset AONB, Heritage Coast and Valued Landscapes

- ENV1 v) gives little or no protection in Sherborne. Further the need for sensitivity over the rural / urban interface is ignored.
- We suggest the landscape around Sherborne is no different than that around Bridport and that accordingly it should be designated AONB.

ENV Criterion vi): Character and Quality of the Landscape and Seascape

- ENV1 vi), the impact on heritage assets and the Charminster Conservation Area is not a constraint for development on the land within Wyatt Homes' control. There are large separation distances with intervening built form between the land within Wyatt's control and the heritage assets and Conservation Area within Charminster. We consider the Council should resist applying this criterion prescriptively to the land within Wyatt Homes' ownership. (Wyatt Homes)
- Policy ENV1 and supporting text do not adequately assess how development may affect non-designated landscapes. Developments within and outside the AONB should both be treated in a sensitive manner reflecting that they will both directly affect people's lives. (Moreton Parish Council)
- We have found the use of the term 'enhanced' potentially misleading. For example LITT1 is consistent with large-scale development?

Responses to Question 2-ii: Policy ENV2 is a new policy relating to sites of geological interest, including the Dorset and East Devon Coast World Heritage Site. Do you have any comments on new Policy ENV2?

General Support

- We support this policy. (Bridport Town Council, Natural England, Sherborne Town Council)
- DWT supports the separation of this into a new policy on geological sites. (Dorset Wildlife Trust)

ENV2 Criterion i): Dorset and East Devon Coast World Heritage Site

- BRID2 completely disregards this stated policy by inflicting significant harm on the heritage setting and Outstanding Universal Value (OUV).
- I support the creation of ENV2 but criterion (i) should be considered against policies ENV4 and ENV5. This would give additional protection to the section of coast between Ferrybridge and Bincleaves on the Portland Harbour shore. In turn, this would stimulate re-instatement of the underbarn walk footpath which is important for people and wildlife.
- Para 2.2.22: I would question whether this statement is necessary in the local plan. (Portland Harbour Authority, Portland Port Group)
- ENV2 (i) 2nd sentence: change 'will' to 'should'. (Portland Harbour Authority, Portland Port Group)

ENV2 Criterion ii): Regionally Important Geological and Geomorphological Sites

- The recognition of RIGS within the planning framework is welcomed. (Portland Town Council)
- We praise the sentiment but would like to see much tougher language. Point ii) especially worries me as it sounds very woolly. I think development in these areas should just not be allowed full-stop.

Responses to Question 2-iii: Former Policy ENV2 (now ENV3) has been revised to more clearly set out how harm to biodiversity will be avoided and net benefits secured. It has also been updated to reflect changes to national policy in relation to irreplaceable

habitats and veteran trees. Do you have any comments on these, or any other changes to new Policy ENV₃?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)
- Natural England fully supports the principles of Policy ENV 3: Wildlife Habitats and Species. (Natural England)

Introduction

- Para 2.3.1: Revised wording suggested. (Dorset County Council: Ecology)
- Para 2.3.1: We support this reference to biodiversity net gain but recommend including Sites of Nature Conservation Interest (SNCl)s and local nature reserves in the list of sites. (Dorset Local Nature Partnership, Dorset Wildlife Trust)
- Para 2.3.2 Revised wording suggested. (Dorset County Council - Ecology)
- Para 2.3.2: We welcome the reference to compensation being a last resort, however recommend removing 'significant' from harm - the hierarchy of avoid, mitigate, compensate (as a last resort) should be followed for all potential harmful impacts, whether significant or not – the cumulative impact of those not deemed significant is likely to become significant. (Dorset Local Nature Partnership, Dorset Wildlife Trust)

National Wildlife & Geological Sites

- Para 2.3.9: Change wording from 'will resist development' to 'will not normally permit development' to ensure the wording reflects the NPPF. (Dorset County Council: Ecology)

Irreplaceable Habitats and Aged or Veteran Trees

- Paras 2.3.10 – 2.3.12: We support the inclusion of 'Irreplaceable Habitats and Aged or Veteran Trees' within the text and policy, but believe that the protection for veteran trees should be at the same level whether they are within a woodland, (or wood pasture), or are individual trees within the landscape, such as within a hedge-line. (Dorset Wildlife Trust)
- Para 2.3.10: The list of irreplaceable habitats includes reference to 'some types of reedbed'. We would recommend this is amended to 'some types of lowland wetland habitats'. Similarly, 'heathlands' should be replaced with 'wet heaths and mires'. (Natural England)
- Para 2.3.11: Reference to a suitable mitigation strategy should be expanded to 'mitigation and compensation strategy'. (Natural England)
- Para 2.3.12: It is not clear if separating out veteran trees and ancient woodlands is giving them differing protections. These need to be equally protected. (Dorset Local Nature Partnership)

Protected Species

- Para 2.2.13: Ancient trees are not considered a protected species and are covered elsewhere. We would suggest you replace with a reference to 'common reptiles species'. (Natural England)

- Para 2.3.14 Revised wording suggested. (Dorset County Council: Ecology)
- Para 2.3.14: Revised wording suggested. If protected species are thought to be possibly present on a site, then an up-to-date survey will always be required to satisfy the legal requirements for their protection. (Dorset Wildlife Trust)

Biodiversity: Avoiding Significant Harm and Securing Net Benefit

- Para 2.3.15: We recommend removing 'significant' from this paragraph – all harm should follow the hierarchy of avoid, mitigate, compensate. (Dorset Local Nature Partnership, Dorset Wildlife Trust)
- Para 2.3.15: DWT would wish to see specific wording on locally designated sites (Sites of Nature Conservation Interest) within the hierarchy of International – Local site protection, rather than them being included, by implication in brackets, in the section on overall biodiversity interests. (Dorset Wildlife Trust)
- Para 2.3.15 sets out the plan's overall approach, but this is not reflected in ENV3. The 2018 NPPF, paragraph 174 states that Local Plans should identify 'locally designated sites of importance for biodiversity' and 'areas identified by national and local partnerships for habitat management, enhancement, restoration or creation'. SNCIs and other locally designated sites are not explicitly mentioned but are implicitly covered by clauses iv and v.
- Para 2.3.16. We welcome the recognition that compensation should be 'a last resort' in the hierarchy of avoidance of harm to biodiversity. (Dorset Wildlife Trust)
- Para 2.3.17: We request the inclusion of a reference to the Dorset Ecological Network Maps (existing and potential) produced for Dorset LNP by Dorset Environmental Record Centre. This recommendation is in line with NPPF 2018 paragraph 117. (Dorset Local Nature Partnership)
- Para 2.3.17: We support this paragraph on net gain, but recommend that it should include reference to Dorset's Ecological Network and Potential Ecological Network maps, produced By Dorset Environmental Records Centre for the Dorset Local Nature Partnership and these should be included within the Plan document. (Dorset Wildlife Trust)
- Para 2.3.18 Revised wording supplied. (Dorset County Council: Ecology)
- Para 2.3.18 Natural England welcomes and fully supports the reference to the Dorset County Council Natural Environment Team's (DCC NET) Biodiversity Appraisal scheme. Natural England considers that if an application is supported by a DCC NET approval then your authority can be satisfied that a biodiversity net gain will be achieved. We would welcome additional wording to clarify the advantages of submitting a DCC NET approved Biodiversity Mitigation and Enhancement Plan with the planning application. (Natural England)
- Para 2.3.18: Strongly support the recommendation of the Dorset Biodiversity Appraisal system, but note that the term Biodiversity Mitigation Plan has now been amended to Biodiversity Mitigation and Enhancement Plan (BMEP). (Dorset Wildlife Trust)
- Biodiversity Mitigation Plan (BMP) is now referenced as Biodiversity Mitigation and Enhancement Plan (BMEP). It may be useful to reference these in the policy if they are likely to be a validation requirement. (Dorset Planning Consultant Limited)

ENV3 Criterion ii): Nationally Designated Wildlife Sites

- Policy ENV 3ii: Sites of Nature Conservation Interest (SNCIs) and Local Nature Reserves should be included in this section of the policy. (Dorset Local Nature Partnership)

ENV3 Criterion iii): Irreplaceable Habitats

- Criterion iii): The lesser protection for veteran trees away from woodlands is a concern. DWT recommends that the protection for veteran trees should be at the same level whether they are within a woodland, (or wood pasture), or are individual trees within the landscape, such as within a hedge-line. The NPPF Paragraph 175(c) does not make this distinction and implies protection for veteran trees wherever found. (Dorset Wildlife Trust)
- Policy ENV3 iii needs updating to reflect the NPPF: Para 175. The current wording of ENV3 iii makes a false distinction between ancient woodland and ancient and veteran trees outside woods. No such distinction exists. We recommend removing the second sentence and amending the first sentence. (Woodland Trust)
- ENV3. Proposals that would result in the loss of irreplaceable habitats 'will' be refused unless, rather than 'should'.

ENV3 Criterion iv): European Protected Species

- ENV3 should refer to 'significant adverse effect' rather than simply 'adverse effect'. I believe this should be in all applicable paragraphs. Similarly in certain cases we would like to see the use of 'should' instead of 'will'. (Portland Harbour Authority & Portland Port Group)
- Policy ENV 3iv: Reference to ensuring adequate mitigation or relocation needs to be added to the first sentence relating to European Protected Species – otherwise they will receive less protection than other species if the second part of the first sentence overrides their protection. (Dorset Local Nature Partnership)
- Criterion iv) is supported. (Dorset Wildlife Trust)
- ENV3 iv) is too loosely worded. Revised wording supplied.

ENV 3 Criterion v): Mitigation and Compensation

- Policy ENV3 v) Paragraph 2.3.2 and 2.3.16: The biodiversity mitigation proposed for the Vearse Farm development (BRID2) is pretence at negating or even minimising the impacts. Natural England's and / or RSPB's objections to the 2012 draft Local Plan stated 'the protection and enhancement of the natural environment cannot be achieved solely through the provision of mitigation, and compensatory off setting measures.' In practice nothing is actually achieved.
- Bullet v) is supported. We recommend that the word 'significant' should be removed. (Dorset Wildlife Trust)
- ENV3 v): We are unsure what 'biodiversity' specifically means.

Additional Criteria

- ENV3 should be expanded to clarify that all development should seek to secure net gains for biodiversity. Where this is not possible on site then net gains should be achieved by ensuring any unavoidable losses to biodiversity that cannot be fully mitigated on site are compensated through appropriate off site measures. Typically

this can be most simply achieved through an agreed financial contribution to biodiversity enhancements elsewhere. (Natural England)

- SNCIs along with the national and internationally designated sites form the core of the ecological network and their long term protection and enhancement is central to the objective of delivering sustainable development and a net gain for biodiversity. ENV3 should therefore include a specific reference for the protection of SNCIs. (Natural England)
- Do you need to provide a clearer referencing to European designations or substitute legislation following clarity around EU withdrawal? The new NPPF does not specifically mention SNCIs and LNRs. (Portland Town Council)
- The impact of the UK's impending withdrawal from the EU should be considered in relation to EU regulations referred to on pages 26 and 27. (Bridport Town Council)
- DWT would recommend a specific policy bullet on Local Wildlife Sites (including SNCIs and LNRs) following those on International and national sites. At the least, SNCIs should be specifically mentioned in bullet iii). (Dorset Wildlife Trust)
- We would like to see tougher language. e.g. all trees are not the same, so felling ancient woodland and replacing it with an equal number of saplings is not acceptable and cannot be allowed to be interpreted as 'maintaining biodiversity' - that's just one example. Also, need to be clearer on indigenous species as taking priority and clear intolerance of invasive species.

Responses to Question 2-iv: Former Policy ENV₃ (now ENV₄) has been redrafted to define the elements that make up the green infrastructure network in the plan review area and to set out how the network will be protected, expanded and enhanced. Do you have any comments on new Policy ENV₄?

General Support

- We support the policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)
- We support the improvements of this policy. (Dorset County Council: Flood Risk)

General Objections

- The language has far too many get-out clauses which developers can use.
- The very loose use of the words 'will' and 'should' in these statements leave an open door for developers as usual. These things should be mandated and it made very clear who is responsible for long term maintenance and management.

Green Infrastructure

- Para 2.3.21: We would welcome clarity within in this section regarding whether the protection, enhancement and securing the management relates to new and / or existing green infrastructure. We recommend it should include both new and existing elements of green infrastructure. (Dorset Local Nature Partnership)
- Para 2.3.21: It should be made clear that an aim of the local plan is also to create additional green infrastructure through development. (Dorset Wildlife Trust)
- Para 2.3.22: Natural England welcomes and supports the list of potential larger scale improvements for green infrastructure. (Natural England)

Table 2.2: Green Infrastructure Types and Primary Function

- Table 2.2: Land managed as nature reserves including Local Nature Reserves, or Nature Parks, form an important and publically valued component of green infrastructure and should be included within the Type 3 category. Similarly, Natural England recommends that Suitable Alternative Natural Green Spaces (SANGs) are included in Type 3 in Table 2.2. (Natural England)
- Table 2.2: Type 3 'natural and semi-natural green spaces' should include Type 4 'green corridors', as I do not see how a 'green corridor' can be isolated from the green infrastructure network.
- Table 2.2: The value of front gardens has been overlooked. 'Green infrastructure: types of green space and primary functions', doesn't mention the benefit from front gardens 'to making attractive and pleasant built environments'. An additional benefit is providing a natural soak-away for rain.
- Table 2.2 - In type 4 description. Change 'floodplains' to 'flood risk areas' in recognition of all sources of flooding. (Dorset County Council: Flood Risk)
- Table 2.2: The inclusion of sites as 'green infrastructure' does not appear to be based on any set of criteria and no evidence, analysis or justification is presented. Sites within the School's ownership are included which cannot be said to perform any primary function to the overall green infrastructure network and at least one site is a car park. There is no public access to the majority of the areas identified within the School's private ownership and many are not visible from public viewpoints. Sites have been included without any consultation with the School which results in a policy which is unsound and not justified. (Sherborne School)
- Natural England's guidance on 'Green Infrastructure' excludes sports pitches / playing fields and the Landscape Institute include natural and semi-natural features within the definition. WDDC provide no evidence as to why these uses are included in draft Policy ENV4. It is considered that such uses are adequately protected from inappropriate development by other draft local plan policies.
- Table 2.2: The way the table is structured, only showing the suggested primary function of each 'type' of green infrastructure, fails to highlight the importance of the multi-functionality of many types of green infrastructure. (Dorset Wildlife Trust)
- It would be worthwhile to include reference to ecological networks in Table 2.2 under sections 3 and 4. (Dorset Wildlife Trust)
- Having looked at the possible sources referenced in the guidance (<https://www.dorsetlnp.org.uk/hres/Ecological-Networks-Guidance-October-2017.pdf>) this includes Dorset AONB landscape permeability project mapped "sub-core" habitat areas where there is a possibility that the perceived wildlife interest isn't present on the ground. These unverified areas should therefore be treated as indicative rather than definitive, or more flexibility allowed in the policy to avoid safeguarding areas of no actual value. (Dorset Planning Consultant Limited)

Green Infrastructure on Larger Developments

- Para 1.1.1.7: Revised wording suggested. (Dorset County Council: Ecology)
- Para 2.3.24: The proposal for Vearse Farm (BRID2) includes a community farm / orchard of up to 0.6 hectares; the site is presently a farm of either 45 or 50 hectares. It is ludicrous to suggest that the loss of an entire farm can be compensated by the inclusion of a tiny pretend one.

- Para 2.3.24: We support the inclusion of the Building with Nature accreditation programme. (Dorset Local Nature Partnership)
- Para 2.3.25: We recommend that improving access to high quality greenspace is included within this paragraph. (Dorset Local Nature Partnership)

Map of Green Infrastructure

- ENV4: We are particularly concerned about this policy which is not at all helped by a poor quality supporting policy map. The combined effect is one which puts into jeopardy the development of Portland Port Key Employment Site. The section relating to Green Infrastructure should be revisited with key employment sites such as ours in mind. (Portland Harbour Authority & Portland Port Group)
- The policy map to set out the potential GI network is too small and it would be helpful to enlarge it so that the full intentions can be reflected in neighbourhood plans and also cross check against greenspace designations. (Portland Town Council)

ENV4: General Comments

- Fully support the principles of Policy ENV 4 and welcome the provision set out at clause i). It would be helpful if the supporting text included a reference to ensure that any increased costs of the management of areas of green infrastructure, including nature reserves, caused by new development are appropriately compensated. (Natural England)
- Access to accessible greenspace is associated with positive health outcomes including improved mental and physical health. We support the aim of Policy ENV4 to preserve, expand and enhance green infrastructure. (Public Health Dorset)
- Policy ENV 4 Green Infrastructure Network is supported. (Dorset Wildlife Trust)
- Developers should be required to provide more than just a green area on the edge of new developments. The area should have landscaping, a children's play area and be an integral part of the development. (Moreton Parish Council)
- Although supporting, the real problem is that most sites allocated in this document are greenfield sites so we destroy green to create green! All such sites must, therefore, be well landscaped to fit into the local landscape etc. (Dorset CPRE)
- Given the level of proposed development, it is essential that existing green infrastructure is protected, and every opportunity is taken to create new green infrastructure. This will ensure that habitats do not become increasingly fragmented and vulnerable. Further green infrastructure is vital for health and wellbeing, for promoting exercise and sustainable travel and for amenity value. (Woodland Trust)
- We would like to see more ambition here and a clear expectation on developers to enhance the green infrastructure network, as well as protecting the functionality of the existing network. (Woodland Trust)

ENV4 Criterion i): Primary Function of Green Infrastructure Elements

- We are concerned about the change from protecting the green infrastructure network to protecting the 'primary function of any element of the green infrastructure network.' As primary functions can be re-located, we believe this to be a detrimental change.

- It is requested that the commitment to local partnership working in 2015 Policy ENV₃ (i) be restored in the revised Local Plan as follows: 'The councils will work together with local communities and other relevant partners to develop a green infrastructure strategy for the plan area.' (Bridport Town Council)
- Paragraph i) does not stop development on green infrastructure, it merely protects from the adverse impacts of development. There is no definition of what constitutes an adverse impact. (Moreton Parish Council)

ENV 4 Criterion ii): Enhancing the Green Infrastructure Network

- In paragraphs ii) to v) there does not appear to be any guidance on what a developer should create when required to create green infrastructure. (Moreton Parish Council)

Responses to Question 2-v: Former Policy ENV₄ (now ENV₅) has been revised to more clearly set out how impacts on the significance of designated and non-designated heritage assets and proposals for enabling development will be considered. Do you have any comments on new Policy ENV₅?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)
- Historic England welcomes this strategic policy and commitments. (Historic England)
- It's essential that the policy recognises the circumstances in which development affecting a heritage asset will be acceptable. This approach is supported. (Luxury Family Hotels)

ENV₅: General Objections

- Retrospective planning applications should be penalised and also Dorset should take enforcement seriously. Sherborne has a large number of listed buildings in its main conservation area for which retrospective planning applications for work on them have been made. We suggest ENV₅ should be enhanced.
- Should there be referencing to local listing and heritage and character type studies to encourage local heritage awareness? The new NPPF talks in terms of new development in conservation and World Heritage sites and within the setting of heritage assets to better reveal their significance. (Portland Town Council)
- Heritage assets are almost always worth more protected - in terms of enhancing local beauty, interest, knowledge, historical and social importance, tourism, employment etc.
- Fully agree, but this policy must be applied strictly. We have had recent examples where the heritage aspect has been down played or neglected completely. In Dorset's towns and villages we have many heritage buildings and sites and these must be protected!

Designated Heritage Assets

- Para 2.4.10: In relation to the 2017 planning application for Vearse Farm (BRID₂), the Conservation Officer's original conclusion was that development would inflict

'substantial harm' on heritage assets. These objections, including the 'substantial and significant harm' conclusion, were ignored and the application was largely unchanged. The Conservation Officer was bullied into 'reluctantly' downgrading the objection.

Non-designated Heritage Assets

- Para 2.4.14: This refers to undesignated archaeological sites. What is said about these looks fine, but it should be recognised that archaeological remains do not exist in isolation - their locations and relations to other remains are important. (Dorset County Council: Archaeology and Environment & Economy)

Assessing Significance and Impacts

- Bridport Town Council requests that areas of archaeological potential are highlighted at paragraph 2.4.18, by restoring the text from 2015 paragraph 2.3.8. (Bridport Town Council)
- Bridport Town Council notes changes in the text referring to demolition of important local buildings and request that the original text from 2015 paragraphs 2.3.12 and 2.3.13 is restored in paragraph 2.4.20. (Bridport Town Council)

Weighing Public Benefits Against Harm

- Para 2.4.24: It would be helpful if employment / economy could be specified as an example of public benefit. (Portland Port Group & Portland Harbour Authority)
- We do not believe that any attempt has been made to 'weigh the 'public benefits' against the 'harm' caused to the significance' of BRID2 as part of the heritage asset setting, its landscape, agricultural land and buildings (2.4.23).
- The 'scale of any expected public benefit' for Vearse Farm has not been established as stipulated by paragraph 2.4.24.

ENV 5 Criterion iii): Harm or Loss

- No adequate impact assessments have been submitted to demonstrate that BRID2 is in keeping with the revised ENV5 in terms of 'any harm or loss', or that it has been 'demonstrated that the harm / loss is necessary to achieve substantial public benefits that outweigh that harm / loss'.

ENV5 Criterion viii): Enabling Development

- A number of 'grey' areas: 'exceptional circumstances' again undefined. (Historic England)
- Whilst we appreciate that Policy ENV5 and its reference to enabling development reflects Historic England's guidance on this issue, there is a growing consensus that enabling development should not be planned for with a supporting policy incorporated in a Local Plan. Local Plans do not require a specific enabling development policy. (Historic England)
- Notwithstanding our preference to remove this aspect of Policy ENV5, we understand that should the local authority wish to retain reference in some form we would suggest reference to Historic England's latest guidance on Enabling Development. This will ensure that the policy stays relevant over the plan period should there be any published revisions. (Historic England)

Strategy for the Conservation of the Historic Environment

- You may also wish to consider how to capture non-designated heritage assets of local importance that are not found within Conservations Areas. (see para 2.4.33) (Historic England)

Responses to Question 2-vi: Former Policy ENV5 (now ENV6) has been revised to provide more guidance on how the 'sequential test' in relation to flooding will be applied. Former Policy ENV6 relating to local flood alleviation schemes has been deleted and replaced by some commentary in the supporting text. Do you have any comments on new Policy ENV6 or the deletion of former Policy ENV6?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)
- We support the improvements within the policy to consider all sources of flood risk. (Dorset County Council: Flood Risk)

Section 2.5: Protecting Ourselves from Natural and Man-made Disasters

- Section 2.5: We welcome reference to the impacts of extreme temperatures to human health but note that the following sections include no reference to adaptation to these impacts. This could be cross referenced back to the Green Infrastructure section (e.g. green walls / roofs). (Dorset Local Nature Partnership)
- In this section it would be useful to cross reference the section on green infrastructure and its cooling effects and other benefits. (Dorset Wildlife Trust)

Flood Risk Zones

- Change 'defined zones' to 'defined fluvial and coastal zones'. Within each zone there maybe areas at risk from other sources which increase the flood risk for an area. (Dorset County Council: Environment & Economy)
- For the avoidance of doubt it may be better to refer to flood risk areas (rather than zones) given that flood risk zones are not defined for surface water and groundwater flooding. (Dorset Planning Consultant Limited)

Flood Risk Assessments

- Any flood risk assessment will need to include 'local knowledge' and not just rely on a strict interpretation of the Environment Agency's Flood Risk model output. Using this 'literal interpretation' approach has led to flooding issues that were not resolved by the developer before they went into liquidation. Please insert a statement about ground-truthing the model data through local consultation.
- Para 2.5.6: In relation to the planning application for Vearse Farm (BRID2), officers simply relied upon the flood risk assessment prepared by the developer - no independent assessment was performed.

Paragraph 2.5.7: Sustainable Drainage Systems

- The use of SuDS for new development is fully supported. The policy or supporting text should require SuDS to be designed to maximise their benefits for biodiversity so that they contribute to delivering a net gain for biodiversity. (Natural England)
- We recommend that references to SuDS are cross referenced with the GI section and the multifunctional benefits to wildlife and improved access to greenspace are included. Support for Natural Flood Management schemes should also be included to support both reducing flood risk and other multifunction benefits. (Dorset Local Nature Partnership)
- SuDS have multi-functions and should be expected to create green space and biodiversity enhancements too. (Dorset Wildlife Trust)

Flood Management Schemes

- We would recommend that ENV6 advises that surface water management plans are prepared in accordance with the approved drainage hierarchy, as per Planning Practice Guidance. (Wyatt Homes)
- Natural flood management schemes should also be supported within the policy. (Dorset Wildlife Trust, Dorset Local Nature Partnership)

ENV6: General Objections

- We are seeing sites that are prone to flooding being selected as suitable for development, so will this policy be fully applied in practice? (Dorset CPRE)

ENV6 Criterion i): Avoiding Areas of Flood Risk

- ENV6 i) states: 'new development or the intensification of existing uses should be planned to avoid risk of flooding, where possible.' We believe that this should read 'must' instead of 'should', and that 'where possible' should be deleted.

ENV Criterion ii): Sequential / Exception Tests

- Criterion ii) and iii) of Policy ENV6 appear to cover the criteria of the Exception Test as set out in the NPPF and NPPG, albeit the wording does not clarify that flood mitigation should be throughout the lifetime of the development. We seek clarity on whether this reference to flood mitigation has been purposely excluded. (Wyatt Homes)

Additional Points

- Major developments can include mitigation measures such as the creation of wetlands, wet meadows or wet woodlands which can reduce flood risks. An additional paragraph supporting natural flood management such as these measures should be included in the section on flood risk. (Dorset Wildlife Trust)
- There should be an additional paragraph indicating that permission will be refused for developments that are proposed to connect onto a drainage / sewage network that is already overloaded, unless the developer can show that adequate improvements will be made before development commences where run off is a problem, and before first habitation where sewage is deemed to be a problem.
- It may be helpful to assign a hierarchy of alternative sites so that developers can assess relevant proposals. (Portland Town Council)

- We would prefer the restoration of local consultation on flood alleviation schemes as set out in the 2015 Local Plan, Policy ENV6. (Bridport Town Council)

Responses to Question 2-vii: Former Policy ENV7 has been replaced by a separate policy (new Policy ENV7) on land instability, which includes more detail on how proposals for development in the Charmouth and Lyme Regis Land Instability Zones will be assessed. More detailed policies (new Policies ENV8 and 9) have been drafted to set out the approach to development proposals at risk from coastal erosion. Do you have any comments on new Policies ENV7 to 9?

ENV7: Land Instability - Support

- We support this policy. (Sherborne Town Council, Dorset County Council: Environment & Economy)

Policy ENV8: New Build Development Within the Coastal Change Management Area

- We support this policy. (Sherborne Town Council)
- Can the background paper which summarises the risk of coastal erosion / land stability for Portland and proposed sterilisation areas given the proximity of certain sites, be referred to?

ENV9: Replacement of Existing Dwellings and Farm Buildings within the Coastal Change Management Area

- We support this policy. (Sherborne Town Council)
- Natural England is concerned that the Policy ENV9 may override the other ENV policies. We feel the policy should be clear that both residential and agricultural replacement buildings will be required to avoid impact on designated wildlife sites and biodiverse habitats (e.g. priority habitats) and be acceptably located with reference to the protected landscape of the AONB. In addition, the requirement for demolition would be problematic if the existing building was found to support an active bat roost, where the retention of the building for the bats would need to be assessed as a potential alternative to the loss of the roost. (Natural England)
- All ENV9 proposals should be subject to appropriate bat checks and the submission of a pre-application Biodiversity Mitigation and Enhancement Plan, preferably approved by the DCC NET. The policy should also be amended to leave the possibility of retaining structures for a longer period as bat roosts. (Natural England)
- Policy ENV9 allows the replacement and relocation further inland of existing homes and farm buildings threatened by coastal erosion in the next 50 years. For Burton Bradstock, any such replacement homes or buildings would be in or adjoining the DDB. (Burton Bradstock Parish Council)

Policy ENV10: Agricultural Land and Community Schemes for Local Food or Crops

Local Food Production

- Para 2.5.35: We recommend including reference to the benefits of physical activity associated with community growing activities as well as access to healthier food. (Dorset Local Nature Partnership)

Energy Crops

- We support in principle the policy to support local energy crops – but would wish to caveat that some energy crops can be environmentally detrimental e.g. soil damage, increased soil run off, and limited biodiversity opportunities. (Dorset Local Nature Partnership)
- We would recommend that bullet ii) is amended to include the words 'provided that such schemes can be shown to have no adverse impacts on biodiversity.' (Dorset Wildlife Trust)
- Para 2.5.35: DWT supports the principle of local community growing schemes, including for local energy production, but caution should be exercised in allocating land for biofuels, which in some cases (such as maize or even woodland planting), can have an adverse impact on biodiversity. (Dorset Wildlife Trust)

Loss of Agricultural Land

- Much of the development proposed is on good quality agricultural land. What we should have in this document is the brownfield sites register and then alongside what sites are actually proposed in the plan. (Dorset CPRE)
- Paragraph 2.5.33 and 2.5.34 contradict national policy. Policy should give at least equal weight to the importance of agricultural land given the need for sustainable food supplies in an increasingly uncertain world (e.g. not least in terms of Brexit). The idea that the loss of 45 hectares of Grade 2 farmland on BRID2 can somehow be offset by a few allotments is ludicrous.
- Paragraph 2.5.33: The majority of Vearse Farm (BRID2) is Grade 2 'very good quality agricultural land', with the rest Grade 3. Building on this farmland will harm the sustainability of the nation and make it more dependent on imported food.
- Other options for land such as brownfield sites and 'areas of poorer quality land' (2.5.33) have not been considered as alternatives for BRID2.

Responses to Question 2-viii: Former Policy ENV9 (now ENV11) has been expanded to relate to air pollution as well as water pollution and contaminated land. Do you have any comments on new Policy ENV11?

Support

- We support this policy. (Sherborne Town Council)
- We fully support the inclusion of air quality within Policy ENV 11. (Natural England)
- We support the expansion of Policy ENV11 to include air pollution. Air quality is a significant public health issue and reductions in air pollution can lead to improved public safety and promotion of outdoor activity and social interaction bringing added benefit. (Public Health Dorset)
- We fully endorse new Policy ENV11.

Pollution Mitigation Standards

- ENV11's standard of increased air pollution being permitted if it 'can be mitigated to the appropriate standard' is inadequate because the science is still advancing. WHO's standards dates from 2005, but because of medical advances they are working on a new set due in 2020 which will no doubt be lower again.

- ENV11 has been updated to include air pollution, but doesn't specify the types of air pollution, or their sources. Planners tend to concentrate on NOX and traffic as its source. More attention should be given to small particulate matter, which travel deep into the lungs where they cross into the bloodstream and congregate in vital organs, upsetting the chemical balance. The brain is one area getting a lot of research, with correlation being found with dementia, particularly Alzheimer's.
- No 'appropriate' standard has been defined in terms of mitigation, aside from a vague allusion that this 'in many cases will be set by the pollution control authorities.'

Traffic Pollution / AQMAs

- Perhaps this policy could be clarified in respect of traffic in areas where there is an existing air quality problem. Suggest recommending traffic management measures to address air quality concerns where new development would add to a pre-existing problem. (Dorset County Council: Transport and Environment & Economy)
- Paragraph 2.5.36 and 2.5.37: West Dorset has a very limited transport infrastructure. The action plan for Chideock AQMA suggests that further development within the designated area should be limited.
- The WDDC website (Air Quality in Dorset) states that East Road, Bridport has 'shown exceeded levels of NO₂. However, at present there is no intention to declare an Air Quality Management Area (AQMA)'. This goes against Government regulations and has been repeatedly criticised by DEFRA.

Vearse Farm, Bridport

- The Vearse Farm development will greatly increase traffic congestion and thus pollution which will have 'diffuse and cumulative impacts' (2.5.36)

Dorchester

- If a rural property isn't on a gas main then its fuel options are limited but a Dorchester property is free of this constraint. Too much solid fuel is already being burnt domestically within Dorchester for mainly aesthetic reasons. There is no need for a 'wood burner' to be installed in a highly insulated modern home in the town. The council should restrict this discretionary pollution in Dorchester, and especially on new developments, e.g. by using covenants to ban their installation.
- It is surprising that Watson's Oil in Dorchester and the gas holder site in Weymouth are not on the contaminated land register. (Dorset County Council: Transport)

Growth at Crossways / Dorchester

- The policy needs to include air pollution. As examples, building a commuter village at Crossways or increasing employment in Dorchester are not in line with this policy. (Weymouth Civic Society)

Responses to Question 2-ix: Former Policies ENV10 and 11 (now ENV12 and 13) have been revised to more clearly set out design expectations in relation to the landscape and townscape setting and the pattern of streets and spaces. Do you have any comments on new Policies ENV12 and 13?

General Support

- We support policies ENV12 & 13 (Sherborne Town Council)
- We welcome a commitment to ensuring future development will be sympathetic to local character and history, including the surrounding built environment and landscape setting, and establish or maintain a strong sense of place. (Historic England)
- Para 2.6.3: We support the reference to the creation of and access to 'high quality' Green Infrastructure. (Dorset Local Nature Partnership)

Introductory Text on Design: Paras 2.6.1 to 2.6.6

- Shouldn't the design principles be included in a specific design policy to ensure consistency with national policy? (Historic England)
- Para 2.6.2 - Identity and Distinctiveness: add in the need to enhance the existing 'places', to ensure that the current architecture is taken into consideration when designing new architecture.
- Where local design guidance has been produced and accepted this should be referred to in the policy statement. (Portland Town Council)
- Might the Plan refer to Poundbury and other successful developments and the successful components which provide a reference / benchmark for future planning, public realm and design quality? (Historic England)

ENV12 and ENV 13: General Objections

- To accord with the provisions of national policy the councils will need to be able to demonstrate that the Local Plan: provides a clear design vision and design policy that is grounded in an understanding and evaluation of an areas defining characteristics; has evaluated and understood the defining characteristics of the area as part of its evidence base, in order to identify appropriate design opportunities and policies; ensures that there is access to and appropriate use made of design advice and design review panels. It is presently unclear of the measures that are / will be in place. (Historic England)
- A sentence should be added to ENV12 and ENV 13 that the guidance should be applied to all developments, and not just on high profile developments. (Moreton Parish Council)
- It would appear that WDDC has been discriminating in its insistence on application of the townscape and pattern of streets and spaces. (Moreton Parish Council)
- ENV12 & ENV13 have to be applied rigorously in the future. It hasn't been in the past and is crucially why so many are against any form of development.
- ENV12 & ENV13: The reality of the ugly estate built to the north of Sherborne makes these policies ring very hollow.
- Would like to see the word 'should' replaced with the word 'must'. Would also like to see more emphasis on local vernacular architectural styles being a higher priority.
- The policy does not set out how the council will view the 'interface' between existing development / housing and any planned new development.

Policy ENV12: Support

- Para 2.6.8: We welcome mention of retaining woodlands, trees and hedgerows and landscape planting for both the biodiversity benefits and the health and wellbeing benefits – evidence shows that being around nature has health benefits. (Dorset Local Nature Partnership)
- Para 2.6.10: We particularly welcome para 2.6.10 which highlights that 'development should not result in loss of (or damage to) existing woodlands, trees or hedgerows' and 'significant' replacement planting of native trees should be undertaken to achieve net gain'. (Woodland Trust)

Policy ENV12: General Objections

- Para 2.6.11: Add a final sentence: Policy ENV3 is also relevant when considering loss of trees, hedgerows and appropriate mitigation and off-site compensation (Dorset County Council: Ecology)
- Para's 2.6.11-2.6.13: We recommend 'usually' is taken out of 2.6.12 because this is unnecessary as it already says these are preferred. (Dorset Local Nature Partnership, Dorset Wildlife Trust)
- The reference to native species in new landscape planting should be added to Policy ENV 12 bullet iii). (Dorset Wildlife Trust)
- ENV12 i). We find the use of the term 'respond to' vague and confusing. We suggest that the term 'be sympathetic to' is used instead.
- We would like an explanation for the removal of a commitment to public art, and to historical, ecological or geological features, as contained in 2015 Policy ENV10. (Bridport Town Council)

ENV12: Vearse Farm, Bridport-based Objections

- The Vearse Farm (BRID2) developers have failed to demonstrate how the development will contribute to the 'distinctiveness and local identity' of Bridport and its environs (2.6.9). It will make a negative contribution to the 'local identity and distinctiveness' of Bridport and its surrounding villages and ruin what makes it special and unique.
- Vearse Farm (BRID2) will be detrimental to 'the overall quality' of the area, 'harm the character and enjoyment of the site' and 'surrounding area, including woodlands, trees and hedgerows'.
- Vearse Farm (BRID2) will ruin the 'sense of place' of Bridport, its AONB and national heritage asset setting. No amount of design and 'landscaping' will compensate for this irreplaceable loss.
- Vearse Farm (BRID2) will spoil landscape views from Eype, Symondsburry, the iconic Colmer's Hill and the actual and surrounding AONB and national heritage landscape.

Policy ENV12: Dorchester-based Objections

- The North of Dorchester proposal could not contribute positively to the maintenance and enhancement of local identity and distinctiveness, because the development itself would diminish that identity and destroy that distinctiveness.

- The wording of ENV12 should be revised to reflect the needs of large employers and public service providers based on the sustainable benefits of doing so. (Dorset County Hospital)
- DCHFT supports the importance of development contributing positively to the enhancement of local identity and distinctiveness. However, the DCH campus is a large area with large buildings within predominately residential surroundings. Therefore, to ensure the long-term sustainability of DCH in Dorchester, it needs to be recognised that new development may need to take place which does not always respond to the character of the immediate area. As part of the planning balance, the importance of high quality healthcare in a sustainable location outweighs any harm. (Dorset County Hospital)

ENV13: Support

- Para 2.6.18: We support the inclusion of biodiversity benefits in this paragraph. (Dorset Local Nature Partnership)
- We support the design expectations set out in policy ENV13, particularly the focus on encouraging walking and cycling by specifying that places should be easily navigable, not dominated by roads or parking and the provision of strategic walking and cycling routes and cycle storage. Infrastructure that supports walking, cycling and enables physical activity is important for creating environments that support people to avoid being overweight and obese. (Public Health Dorset)

ENV13: General Objections

- In new Policy ENV13, climate change should be a criterion for sustainability in design. (Bridport Town Council)
- Policies on shared space need to take account of recent guidance from the DfT deleting LTN1/11 Shared Space and issuing the new Inclusive Transport Strategy. (Dorset County Council: Transport and Environment & Economy)
- The plan should give careful consideration to the specific needs of older people, people living with dementia and their carers to ensure that streets and spaces are designed to facilitate independence by enabling safe access to amenities including services and dementia friendly greenspaces. (Public Health Dorset)
- We would welcome clearer reference to prioritising walking, cycling and use of public transport in new development, while recognising that in rural areas access to travel modes other than private car can be limited. Specifying that in residential areas, or where pedestrian activity is high, design of new vehicular routes will aim to keep traffic speeds below 20mph would contribute to this. (Public Health Dorset)

ENV13: Vearse Farm, Bridport-based Objections

- The measures proposed will not solve the problem of providing safe pedestrian and cycle access to locations other than Bridport town centre.
- When Vearse Farm was granted consent on 3 November 2017, two developments that will result in an additional 125 dwellings plus commercial premises had already been approved. Traffic from both of these developments will have a direct impact on junctions at West Allington with North Allington and South Street with East Street. No revised traffic flow figures have been produced that show acceptable levels will be maintained once the two developments are complete.

- Policy BRID2 refers to at least two points of vehicular access from West Road to Vearse Farm, whereas the outline planning application referred to just two. Please could this point be clarified? The clarification needs to also include details on the impact of further access roads on West Road, traffic flow and safety.

Responses to Question 2-x: Former Policy ENV12 (now ENV14) has been revised to more clearly set out expectations in relation to the siting and design of buildings. Do you have any comments on new Policy ENV14?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)

ENV14: General Objections

- The policy should refer to the opportunity to permit buildings and structures of modern design where they will result in the achievement of the objectives set out in the policy. (Symondsbur Estate and The Watton Hill Trust)
- Policy ENV14 should be revised to consider the function of buildings in addition to the form. (Dorset County Hospital)
- 'Good design' - covers various references in this chapter at both architectural and urban planning level (e.g. materials quality, design standards, eco-building, cycle and public transport promotion, pedestrian safety, high density building, water management etc.). The document contains no detail on what constitutes good design, or how this will be measured and monitored.
- Housing design is small and boring.

ENV14: Site / Place-based Objections

- **Vearse Farm, Bridport:** ENV14 says that 'development will only be permitted if the siting ... would: complement and respect the character of the surrounding area' and 'reinforce the sense of place'. Vearse Farm, Bridport contravenes this and will also 'overpower ... neighbouring properties'.
- **Woodsford Estate, Crossways:** This is a worthwhile policy but its application in Crossways in the Woodsford Estate shows that it is not enforced. (Moreton Parish Council)
- **Dorset County Hospital, Dorchester:** The policy should be reworded to ensure that the function of the development is not compromised in order to deliver a certain form. This policy could restrict the sustainable future of DCH, therefore should be rewritten and accord with NPPF paragraph 8o. (Dorset County Hospital)
- **Barton Farm, Sherborne:** This is a prime example where the developer has ignored good design, local building styles, landscaping and been allowed to get away with it. The reality of the ugly estate built to the north of Sherborne makes this policy ring very hollow.

Responses to Question 2-xi: Should the councils gather more evidence with a view to including policies in the local plan review which would apply the additional accessibility and adaptability standard and the optional nationally described space standard?

Optional Technical Standards for Housing - Support

- Agree the councils should gather more evidence to include policies applying the additional accessibility and adaptability standard and the nationally described space standard. (Bridport Town Council, Burton Bradstock Parish Council, Dorset Planning Consultant Limited)
- Support the inclusion of policies which ensure new homes are accessible and adaptable for all and provide adequate space. We would be happy to work with the Councils in gathering evidence to support these policies. (Public Health Dorset)
- Yes, particularly in relation to establishing lifetime design guides. (Portland Town Council)
- More evidence should be collected due to the rising age of the population. (Sherborne Town Council)
- Gardens are too small.

Optional Technical Standards for Housing – Conditional Support

- It would be useful to include policies on the provision of cycle storage space for new developments. (Dorset County Council: Environment & Economy)
- The additional accessibility, adaptability and space standards should only be accepted and applied if they result in houses with larger rooms and doorways. (Moreton Parish Council)
- Gather more evidence, but remember the ageing population of Dorset and their special needs.

Optional Technical Standards for Housing – Objections

- An additional local policy would be superfluous, as this is sufficiently covered by the NPPF and Building Regulations Part M. (Wyatt Homes)
- Any space and / or accessible / adaptable homes standards should be set by applying the criteria in the NPPF (para 127f & Footnote 42). (Home Builders Federation)
- If the Councils wish to adopt the higher optional standards they should apply the criteria set out in the NPPG (ID 56-005 to 008). A local assessment should evidence the specific case for the plan area which justifies the inclusion of these standards as a policy requirement and the quantum thereof. (Home Builders Federation)
- The NPPG confirms that M4(3) standards are only required to those dwellings where the councils are responsible for allocating or nominating a person to live in that dwelling (ID 56-009). (Home Builders Federation)
- Policies should only make use of the nationally described space standard where the need for such a standard can be justified. Need, viability and timing should be taken into account (Home Builders Federation, Persimmon Homes, Wyatt Homes)
- The Sustainability Appraisal Summary (page 6) sets out the reasoning for not pursuing the inclusion of adaptability and accessibility standards. Given the above, there would appear to be no justified reason for the inclusion of accessibility and adaptability standards. (Persimmon Homes)
- Were new policies to be introduced on technical standards at the pre-submission stage it would effectively remove the ability for meaningful comments from representors, who would only be able to comment on soundness. A designated consultation period is recommended. (Persimmon Homes)

Responses to Question 2-xii: The supporting text to the former Policy ENV13 (now ENV15) has been redrafted to clarify how the councils aim to achieve higher levels of environmental performance for larger developments, individual buildings and historic buildings. Do you have any comments on new Policy ENV15?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Sherborne Town Council)
- DCHFT supports the overall objective of achieving high levels of environmental performance. (Dorset County Hospital)
- Support ENV15, but recommend that the supporting text includes measures for improving the water efficiency of new developments. (Natural England)

ENV 15: Objections to the Supporting Text

- Para 2.7.14: The plan should remove any references to a 'nationally recognised assessment process' as the requirement for these has been removed at a national level. (Dorset County Hospital)
- Para 2.7.15: A detailed description of exactly what a masterplan would look like, the detail it would contain, how it would be prepared and who would be involved is requested. (Sherborne Town Council)
- Para 2.7.17: We recommend including opportunities for green walls / roofs to support cooling of buildings as an option of reducing energy use within buildings. (Dorset Local Nature Partnership)
- Para 2.7.17: The requirement for solar PV systems to be roof-integrated should be stripped out. I would argue aesthetically and technically for non-integration.
- Para 2.7.19: I am unconvinced that solar thermal and / or solar PV are ineffective or incompatible with historic buildings. Both are perfectly compatible and extremely effective, and should be added to the list of preferred options in 2.7.19.
- Para 2.7.20: should be rephrased to read 'anyone considering how best to improve their listed building should obtain expert advice from a suitably qualified architect, surveyor, or engineer.'

ENV15: Objections

- Policy ENV15 is unnecessary and should be removed, as it is largely related to Building Regulations. There is no indication of what is required to meet 'high standards of environmental performance'. (Persimmon Homes, Wyatt Homes)
- The supporting text states that for domestic buildings, high standards of environmental performance will be achieved through carbon compliance and 'allowable solutions'. Any local requirements should reflect the Government's policy for national technical standards (para 150b). (Home Builders Federation)
- Under the NPPF new development should be planned to help reduce greenhouse gas emissions by location, orientation and design. The starting point for the reduction of energy consumption should be an energy hierarchy of: energy reduction; energy efficiency; and renewable energy before low carbon energy. (Dorset County Hospital, Home Builders Federation)

- There is a view that LPAs may not call for improved energy performance standards for new development. This has been refuted, most recently by the TCPA / RTPA in their note 'Planning for Climate Change: A Guide for Local Authorities'. Policy ENV 15 should be reworded in line with proposals for the Bridport Neighbourhood Plan.
- There is no commitment to any action, for instance rain water storage or solar. As written the policy will be ineffective.
- Can all new build properties have solar panels on the roofs at initial construction?
- Does the policy provide an adequate safeguard to ensure the significant elements of historic properties are appropriately considered to avoid harm? (Historic England)

Policy ENV16: Shop Fronts and Advertisements

Support

- Historic England welcomes this policy. (Historic England)

Responses to Question 2-xiii: Former Policy ENV15 (now ENV17) has been expanded to set out more clearly how the councils will encourage the effective and efficient use of land. Do you have any comments on new Policy ENV17?

General Support

- We support this policy. (Dorset County Council: Environment & Economy, Historic England, Home Builders Federation, Persimmon Homes, Sherborne Town Council, Wyatt Homes)
- Encouraging the use of brownfield sites is welcomed. (Portland Town Council)
- Para 2.9.1: We support the recognition of high environmental value being a cause to not develop brownfield sites. (Dorset Local Nature Partnership)
- Para 2.9.1: DWT welcomes the recognition that brownfield sites can sometimes be of environmental or wildlife value, and the inclusion of the phrase 'provided that the land is not of high environmental value' in encouraging the use of brownfield sites. (Dorset Wildlife Trust)

ENV17: General Objections

- The policy wording should fully comply with section 11 of the NPPF, in particular paragraph 122. (Dorset County Hospital, Wyatt Homes)
- The council should explore opportunities to expand existing settlement boundaries to include neighbouring areas of previously developed land, especially where such land could be utilised more efficiently as set out in the policy. The Former Tented Camp (CHIC5) is one such area that should be considered. (Persimmon Homes)

ENV17 Criterion i): Encouraging Development on Brownfield Land

- Criterion i): Reference to under-utilised land and buildings is poorly defined and could arguably apply across much of the countryside, and perhaps should be limited to within settlements. (Dorset Planning Consultant Limited)
- Criterion i) indicates that the development of suitable brownfield land will be encouraged. This does not go far enough. We believe the prioritisation of brownfield sites is required in order to remove some of the pressure on protected landscapes, green spaces and agricultural land.

- Criterion i): The words 'provided that the land is not of high environmental value' should be included at the end of Bullet i). (Dorset Wildlife Trust)

ENV17 Criterion iii): Mix of Uses / Density

- Criterion iii) is poorly drafted as it does not take account of a range of other factors that would have a bearing on density, such as heritage impacts, flooding etc. (Dorset Planning Consultant Limited)
- Criterion iii): What defines well served by public transport? Delete paragraph as it is not necessary and is counter-productive. (Moreton Parish Council)

ENV17: Objections Relating to Vearse Farm, Bridport

- ENV17 says higher density development should happen in sustainable locations, such as town centres. Higher density development is proposed at Vearse Farm, Bridport outside the town and on an AONB. BRID2 is not 'an appropriate density', despite which it does not meet local housing need, it does not take account of the area's prevailing character, it destroys rather than creates an attractive place to live and will be of severe detriment to the living standards of the population of Bridport.

Brownfield Land Register

- It is obvious that we should support the maximum use of brownfield sites.
- Brownfield development ought to be the preferred option not just encouraged as stated in this policy.
- There should be more openness in looking at current employment sites and if they could revert to dwellings or mixed use.
- We should use empty property to be adapted for housing.
- Mention should be made of the Brownfield Land Register for West Dorset. We are disappointed that it is not more easily accessible and promoted.
- The brownfield register was not published until December 2017, too late for either the adopted LP or, apparently, this review. Further, while the brownfield sites have now been identified and the register published, no indication appears to have been given as to how this information will affect existing (and improve future) planning decisions and action.
- We should put publicly owned land into use, ideally providing affordable housing. If the land has too high a value for affordable housing then it should be sold and the proceeds re-invested in social housing. The public sector should pay council tax / business rates on empty or unused property as an incentive.

Brownfield Sites in Bridport

- In Bridport, the council owns several brownfield sites along South Street, which are derelict or have been only partially used for years. The Council is incapable or unwilling to consider a number of smaller, more suitable, truly sustainable developments on brownfield sites.

Site-based Comments

- Wyatt Homes' pending planning application (LPA ref. WD/D/18/001124) at land at Three Lanes Way, Puddletown makes an efficient and effective use of land, on a site previously identified for development. The proposed development is consistent

with ENV17, whilst respecting and enhancing the surrounding landscape and character of Puddletown. (Wyatt Homes)

- Wyatt Homes' developments at Charminster Farm (phase 1 and 2), within the strategic allocation DOR16, represent an effective and efficient use of land whilst respecting and enhancing the surrounding landscape and character of the area. Phase 3 and land north of Wanchard Lane which also fall within the draft allocation, could provide circa 120 dwellings (70 and 50 respectively) and would integrate well with the existing dwellings in the area. Subject to a landscape led approach to design, there is also the opportunity to provide additional development to the west of DOR16. (Wyatt Homes)

Responses to Question 2-xiv: Former Policy ENV16 (now ENV18) has been expanded to cover the issue of loss of daylight and sunlight. The issue of air pollution is now dealt with in new Policy ENV11. Do you have any comments on new Policy ENV18?

General Support

- We support this policy. (Bridport Town Council, Dorset County Council: Environment & Economy, Sherborne Town Council)
- Para 2.10.8: We welcome the inclusion of the impacts lighting schemes can have on wildlife. (Dorset Local Nature Partnership, Dorset Wildlife Trust)

General Objections

- WDDC's Amenity Policy has no value as, regardless of its apparent merit, it has been and will be disregarded in its entirety.
- Policy ENV18 should acknowledge developments which are being proposed by or on behalf of public sector organisations, such as DCHFT, should not be burdened unnecessarily by requirements which would reduce the value for money case connected to the development. (Dorset County Hospital)
- Sustainability and design principles are superficially good but quite woolly. In a five-year plan it should be possible to put some actual local standards in place. What, for example, is 'excessive' overshadowing? Without this level of detail the fine aspirations can be undercut by supposed exigencies of the building process, and so the standards are never met. There is financial and economic value to the area in high-quality building following sustainability best practice.

Lighting Schemes

- ENV18 should require more than for any lighting to be the minimum required and should seek to reduce light spill. Such schemes should be compliant with the latest guidelines from the Institute for Professional Lighting and the Bat Conservation Trust. (Dorset Wildlife Trust)
- On light pollution CPRE says: '...In many cases it is a matter of recognising that no lighting is required at all. When considering outdoor lighting we specifically recommend that: All outdoor lights are fully shielded and directed downwards. Outdoor lights are switched on only when needed. White light low-energy lamps are used. Avoid orange or pink sodium lights which have an urbanising effect and are less energy efficient. Outdoor lights are only installed if really needed.'

- Clarity is required on whether proposals for external lighting schemes (criterion iii) would include proposals for street lighting. (Wyatt Homes)

Flies

- We request that criterion ii) is updated to include nuisance from flies. Sewage Treatment Works which have filter beds as part of the treatment process can be a source of flies and sensitive development should be located away from these sites. (Wessex Water)

Vearse Farm, Bridport

- Vearse Farm is a huge natural amphitheatre bounded on three sides by hills. It will take around 10 years to complete and this will be 10 years of constant noise to be suffered by local residents. Thus, in contradiction to paragraph 2.10.5, the current tranquil countryside will be an urban noisy cacophony.
- In the planning application for Vearse Farm the developer stated that construction traffic would be negligible and no different from the existing farm vehicle movements. Farm vehicles work the land a few times per year; but the construction traffic, noise, dirt and dust will harmfully affect existing local residents all day, every day, for at least ten years.
- Policy BRID2 contravenes ENV18 in every possible way. It will dominate the landscape in the vicinity and will thus be 'overbearing' and an 'intrusion' in terms of 'artificial lighting schemes', noise and vibration.

Crossways

- I recommend that the policy be applied to all settlements. This will reduce the housing allocation to Crossways in Table 3.3. (Moreton Parish Council)