



**Consultation on the Dorset Council Planning for Climate Change - Interim Guidance and Position Statement
Summary of issues raised and officer responses**

December 2023

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Introduction

Dorset Council prepared three non-statutory guidance documents on planning for climate change. A public consultation on the draft versions of the documents took place from 20 April to 8 June 2023.

The consultation on the 'Planning for Climate Change: Interim Guidance and Position Statement' document drew comments from 80 responders in the online survey, with a number of additional responses received by email. In the online survey around 322 responses to the individual questions were received.

The consultation drew comments from a range of responder types. These included statutory and national bodies such as Historic England, Sport England, and National Highways, and the Environment Agency. Responses were also received from a range of local organisations mainly from the climate and energy sector. A broad geographical range of Town and Parish Councils responded, as did a number of developers and planning agents, and a number of members of the public. The comments received are summarised below, alongside the Council's responses to the comments.

This document provides a summary of the issues raised, and the planning policy team's response to or comments on those issues. Where a change is proposed to the Interim Guidance and Position Statement as a result, this is highlighted in bold.

Summary of issues raised and officer responses

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
Introduction	
<i>Support for the document</i>	
<ol style="list-style-type: none"> 1. The IGPS is a helpful tool in flagging both national and local policy context in relation to climate change and sustainable design and construction. The sustainability checklist clarifies how applications can address the various criteria of these policies. 2. Gloucestershire County Council are broadly supportive of the measures taken through the consultation documents. 3. Agree with the need to plan for climate change. <p><u>CPRE</u></p> <ol style="list-style-type: none"> 4. Praise for DC for recognising the importance of planning in tackling climate change. <p><u>CCAONB</u></p> <ol style="list-style-type: none"> 5. Supports direction of travel for the documents. 	<p>1, 2, 3, 4, 5. Support is welcomed. The purpose of the position statement is to bring together existing legislation, policy, and guidance and to outline how the Council will take into consideration climate change in planning decision making in this context.</p>
<i>Whether there is a need for the document</i>	
<u>Public responses</u>	
<ol style="list-style-type: none"> 6. If it is not mandatory does it have value? 7. Efforts should be concentrated on building more houses for people in need. 	<p>6. It is intended that the position statement will be helpful to applicants and others as it brings together existing legislation, policy and guidance and outlines how the Council will take climate change into consideration in planning decision making.</p> <p>7. The Council is preparing a new Local Plan which will identify locations for new housing.</p>
<i>Status as non-statutory document</i>	
<u>Developers/landowners/agents</u>	
<ol style="list-style-type: none"> 8. IGPS should remain supplementary to existing adopting planning policies. 9. It should not seek to place additional burdens with implications for cost. 10. As it is non-statutory it will carry little or no weight in the planning system 11. The documents proposed are for guidance purposes only and simply reiterate existing planning policy requirements. The value and effectiveness of these documents in decision making may be limited, especially as these documents will not be independently examined. 12. Promoting climate change resilience and delivering efficiencies is a national challenge. The best approach is to avoid prescription at the local level and instead support nationally prescribed standards that may be set out through planning legislation or Building Regulations. This enables consistency and certainty within the wider development industry. 13. Creating different or additional requirements at the local level may potentially delay the build out of development sites. 14. Guidance should state which sustainability mitigation measures are mandatory to include, and which are aspirational at this point in time. 	<p>8. Agreed. This is the intention until approaches can be explored and formalised through the Dorset Council Local Plan.</p> <p>9, 15. Climate change is a key issue that should be considered by applicants when preparing applications. The aim of the position statement is to underline that climate change is a material consideration. Its status is explained in paragraphs 1.1.23-1.1.25. As the document is non-statutory, it is not considered that the position statement will result in significant additional burden or cost.</p> <p>10, 11. Climate change is a key issue that should be considered by applicants when preparing applications. The aim of the position statement is to underline that climate change is a material consideration and ensure that the issue is appropriately and consistently considered by decision makers.</p> <p>12. It is agreed that using nationally prescribed standards would be the most effective route, however it is considered that current national standards do not go</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p><u>Parish and Town Councils</u></p> <p>15. More clarity required on the status of the document.</p>	<p>far enough to address the issue of climate change. The current national position is that local authorities can set their own targets for sustainable design and construction through planning policy.</p> <p>13. The documents are guidance documents and are non-statutory. The intention is not to delay the build out of sites as at this stage the best practice objectives set out in the checklist are not mandatory (unless already required by adopted policies).</p> <p>14. The Checklist itself has supporting text for each set of objectives, which explains the adopted local policy context for each. This will depend on the former district area that the application falls within. More detail will be added to the supporting text in the checklist to clarify where measures are a policy requirement.</p>
<p><i>The IGPS should be mandatory</i></p>	
<p><u>Public, local environmental organisations, Parish and Town Councils:</u></p> <p>16. Without a Local Plan, Dorset Council need to find a means to make this Guidance mandatory</p> <p>17. Concern with the non-statutory status of the document and Sustainability Checklist.</p> <p>18. Clarification is needed regarding how these ideas would be enforced daily.</p> <p>19. Concerned the advice will be ignored by developers and higher targets need to be set.</p> <p>20. Further clarification as to how the council will execute the recommendations noted in the report through planning. Using soft power on developers is suggested.</p> <p><u>Parish and Town Councils</u></p> <p>21. 'Encouraging' applicants does not go far enough to meet aims</p> <p>22. Would like to see statements regarding requirement and enforcement being included.</p> <p><u>Businesses</u></p> <p>23. Concern with waiting for legislation.</p> <p>24. Approach will put developers at a major disadvantage as they will need to be considering more sustainable construction methods far sooner.</p>	<p>16, 17, 21, 22, 23, 24. It is not appropriate to make the position statement and checklist mandatory. The purpose of both is to outline the existing context, how the Council will take climate change into consideration in this context and to outline best practice.</p> <p>18, 19, 20, 22. It should be noted that this is a guidance document aimed at assisting developers with including measures to address climate change. The enforcement of any measures to address climate change within planning applications will be on a case by case basis informed by whether it is appropriate to include relevant planning conditions.</p> <p>23, 24. Consideration will be given to introducing new policy requirements which set higher standards for matters such as energy efficiency, however this needs to be through the new Local Plan which undergoes public examination.</p>
<p><i>The IGPS does not do enough in addressing climate change</i></p>	
<p><u>Public responses</u></p> <p>25. Not positive/progressing/far reaching enough - Council should go further in expectations and actions in relation to new development to ensure both avoidance and adaptation</p>	<p>25. Consideration will be given to introducing new policy requirements which set higher standards for matters such as energy efficiency, however this needs to be through the new Local Plan which undergoes public examination.</p>
<p><i>The IGPS goes too far / beyond its remit in addressing climate change</i></p>	
<p><u>Developers/landowners/agents</u></p> <p>26. Net zero and embodied carbon requirements try and introduce new policy requirements that go further than adopted local policy (Developers)</p> <p>27. The matters discussed in the IGPS and the sustainability checklist would be better dealt with through the new Local Plan. A robust approach to ensure impacts of climate change can be managed should be through resumed progress on the Local Plan. This can include specific and independently examined policies which will carry significant weight as part of the development plan. The content can align with legislation including that contained within the Environment Bill.</p> <p>28. Local guidance must be proportionate and progress in step and in line with national policy and guidance.</p>	<p>26. The position statement sets out that the targets in the checklist are not intended as new policy requirements, they are best practice objectives that applicants can adopt in order to address the issue of climate change in their proposals.</p> <p>27. We intend to explore adopting policies relating to the position statement and sustainability checklist through the development of the Dorset Council Local Plan, and its formal examination process.</p> <p>28. Noted. It is considered that the guidance is proportionate in the context of the key issue of climate change. The guidance is informed by national policy and guidance therefore is considered to be in step and in line with this.</p>
<p><i>A new Local Plan is needed</i></p>	
<p><u>Developers/landowners/agents</u></p> <p>29. Up to date Local Plan with tackling climate change at its heart needed</p> <p>30. Local Plan should be progressed as soon as possible</p>	<p>29, 30, 31, 32, 33. A new Dorset Council Local Plan is currently being prepared, with adoption programmed for 2026. The Plan will address climate change through identifying sustainable locations for development and through a range of policies,</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p>31. Requirements on higher energy efficiency and embodied carbon should be introduced through the Local Plan and tested at examination.</p> <p><u>CPRE</u></p> <p>32. Whilst the Natural Environment, Climate & Ecology Strategy shows commitment to tackling climate change, the 2021 draft Local Plan does not. Information should be provided on how the revised Local Plan will be underpinned by a response to the Climate Emergency.</p> <p><u>Parish and Town Councils</u></p> <p>33. Understand that these statements are weakened by the lack of a Local Plan for Dorset and urge Dorset Council to adopt one with utmost urgency.</p>	<p>including on energy efficiency, green infrastructure, flooding, renewable energy and biodiversity. It is acknowledged that the draft Plan did not go far enough in respect of policy on mitigating climate change.</p>
<i>Consideration of food and farming</i>	
<p><u>National Farmer's Union</u></p> <p>34. The food and farming industry must be taken into consideration to help agricultural businesses adapt and improve with the changing climate.</p> <p>35. Importance of encouraging businesses diversification in order to modernise and to meet net zero but also to meet legislative requirements.</p> <p>36. The mitigation expected to be put in place to allow slurry stores, slurry store covers and buildings to go ahead is also undermining the investment viability of some projects.</p> <p>37. Concern with permissions required from Natural England to allow farm developments - Agricultural Transition Plan and the implementation of the measures under the Clean Air Strategy should be considered in the planning process.</p> <p>38. Infrastructure improvements in digital access, transport and housing are all crucial to drive economic growth and must be enabled by a planning policy which enables investment.</p> <p>39. Need for quicker determination of planning applications - a risk that businesses will miss out on vital economic support that contributes to delivering policy objectives on net zero.</p>	<p>34, 35, 38. Whilst these points are noted they are out of scope of the position statement as this is a guidance document which aims to ensure that climate change is appropriately and consistently considered by applicants and decision makers. The position statement does not set strategy for farming and business diversification and infrastructure investment. This is best considered through the production of a strategic document such as a Local Plan.</p> <p>36. Noted. This is outside of the scope of the position statement.</p> <p>37. This is outside of the scope of the position statement, which does not seek to influence requirements such as those from statutory bodies such as Natural England.</p> <p>39. Noted. This is broadly outside of the scope of the position statement; however it is hoped that the position statement will ensure consistency in consideration and decision making.</p>
<i>Introduction – Paragraph 1.1.2</i>	
<p><u>Parish and Town Councils</u></p> <p>40. The statement excludes a lot of renovation schemes.</p> <p><u>Developers/landowners/agents</u></p> <p>41. Should recognise locations that could be made sustainable by development proposals.</p>	<p>40. It is correct that the focus is on new build, however this would include applications for demolition and rebuilding. Further detail is set out in the proposed changes to the Local List. Consideration will be given to other works that require planning permission in the development of policy in the Local Plan.</p> <p>41. The position statement does not present strategy for the location of development in the Council area. This will be done through the production of the Dorset Council Local Plan. The position statement does set out the role of planning in ensuring development is suitably located and states that this is the primary consideration. The statement and checklist provide guidance on what on-site measures can be taken following locational considerations.</p>
<i>Why do we need a guidance statement? (1.1.4. – 1.1.15.)</i>	
<p><u>Public responses</u></p> <p>42. 1.1.8 claims that it will name three pillars of climate change but names only two.</p> <p>43. 1.1.4, 1.1.5 - Queries the 40% road transport figure as the demographics of Dorset means there is a low number of commuters so this figure must consist of lots of tourist traffic.</p> <p>44. 1.1.9, 1.1.10 - Social, economic and environmental components should be viewed interdependently</p> <p>45. 1.1.12 – Need further detail on transport.</p> <p>46. 1.1.14 – needs more emphasis on reducing energy use through better insulation.</p> <p><u>Public Health Dorset</u></p> <p>47. Suggests the introduction should be improved by noting that the climate emergency has public health impacts</p> <p>48. Suggests climate change mitigation can improve population health by decreasing energy bills</p> <p><u>Local environmental organisations</u></p>	<p>42. The three pillars are climate change, biodiversity loss and environmental resilience as set out in the related diagram in the position statement.</p> <p>43. The paragraph will be amended to reflect information in the Local Transport Plan.</p> <p>44. Agreed.</p> <p>45. This paragraph is to outline the key consideration of sustainable locations for development including whether a location minimises the need to travel by car – this will be amended to reflect this.</p> <p>46. This is quoted directly from the Council's Natural Environment, Climate & Ecology Strategy.</p> <p>47, 48. A reference to benefits to public health will be added.</p>

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<p>49. Would like emissions from waste to be clearly identified in 1.1.7.</p> <p>50. Needs to be a more detailed distinction between the three pillars in line with reduction, mitigation and adaptation.</p> <p>51. Would like clarification as to where biodiversity is covered in 1.1.8.</p> <p>52. Paragraph 1.1.5 is inaccurate.</p> <p>53. 1.1.6-1.1.7 The UK's carbon emissions are 1% of global emissions. Cost of achieving net zero by 2050 is unrealistic and will damage the economy.</p> <p>54. 1.1.5 - the emission reduction is an incorrect misinterpretation.</p> <p><u>Parish and Town Councils</u></p> <p>55. 1.1.10-1.1.11 Will potentially lead to overcrowding and ignores the impracticality of too much reliance on active travel and public services in rural areas.</p> <p><u>Businesses</u></p> <p>56. 1.1.11 is outdated due to decarbonisation of the grid, micro-generation and adoption of EVs.</p> <p><u>Councillors (DC)</u></p> <p>57. 1.1.14. - agriculture is the largest part of the county carbon footprint when other greenhouse gases are included.</p>	<p>49. Further information on this is available in the Natural Environment, Climate & Ecology Strategy.</p> <p>50. Noted. It is not considered necessary to provide more detailed distinction between the three pillars within the guidance document. Further information is available in the Natural Environment, Climate & Ecology Strategy.</p> <p>51. Appendix A gives further information on the ecological emergency and information requirements for biodiversity for planning applications. A new Biodiversity Net Gain guidance document has been prepared and reference will be added to this.</p> <p>52, 54. It is stated in 'Special Report: Global Warming of 1.5C Summary for Policymakers' that global warming is likely to reach 1.5C between 2030 and 2052 if it continues to increase at the current rate. The wording will be amended to ensure this is accurately stated in the position statement.</p> <p>53. Noted.</p> <p>55. Locating development sustainability takes this into consideration, including consideration of appropriate densities.</p> <p>56. Noted, however there is still a way to go with these and locating development sustainability is still an important consideration for and function of the planning system.</p> <p>57. Noted.</p>
<i>Role of planning for sustainable development (Paragraph 1.1.9 – 1.1.15)</i>	
<p><u>Cranborne Chase AONB</u></p> <p>58. The section doesn't mention assessing local housing need as part of the settlement hierarchy; or applying residency requirement to social housing allocation and local connection test to new build private housing.</p> <p><u>Public responses</u></p> <p>59. 1.1.11-13 - There is a need to rethink the methodology of the settlement hierarchy.</p> <p>60. Need to mention Neighbourhood Plans in 1.1.11.</p> <p><u>Parish and Town Councils</u></p> <p>61. The line 'clear objective to boost development of renewable generation' is too broad and simplistic. This cannot be supported without further clarification.</p> <p>62. It is difficult to see how paragraphs 1.1.11 and 1.1.12 have been applied by Dorset Council in its continued promotion of draft Local Plan policy DOR13. This suggests that the principle is not 'well established and embedded in policy and decision making' as stated in paragraph 1.1.3.</p> <p>63. Location of development is key to the approach - appears to be driven more by financial considerations than those of sustainability or desirability or affordability.</p>	<p>58, 59. This is intended to give a brief outline of planning in sustainable locations and the role of settlement hierarchies. Settlement hierarchies will be considered through the Local Plan.</p> <p>60. Reference to neighbourhood plans will be added.</p> <p>61. This is an objective from the Natural Environment, Ecology and Climate Strategy.</p> <p>62, 63. The new Local Plan reviews settlement hierarchies and makes provision for new housing.</p>
<i>Purpose and scope of this statement (1.1.16. – 1.1.22.)</i>	
<p><u>Public response, Local environmental organisations, Parish and Town Councils</u></p> <p>64. Questions why this section only focuses on new developments.</p> <p>65. Clarification on the meaning of 'renewable' is needed as a definition that uses completely natural processes is preferable.</p> <p>66. 1.1.18 – more emphasis on ecological aspects is needed.</p> <p><u>Public response</u></p> <p>67. Building efficiency and protection / restoration of green infrastructure should be given weight in the planning process.</p> <p><u>Dorset Council Cllrs</u></p>	<p>64, 69. The planning process broadly only relates to new planned development and therefore a focus on retrofitting of existing development is generally outside the scope of the position statement.</p> <p>65, 74. A definition of 'renewable' will be added to the position statement.</p> <p>66. As noted within the position statement, ecological issues are broadly well covered by existing policy frameworks. However the council has recently published a Biodiversity Net Gain Guidance Note for Applicants and Agents which provides information of how ecological issues will be considered. Reference to this will be added to the position statement.</p>

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<p>68. It is not explicit that the section covers the three stages of a development in terms of carbon emissions – materials and construction, energy performance and use, and carbon implications of the behaviour likely from the users of the building, including sustainable locations.</p> <p><u>Historic England, local community organisations, Local environmental organisations, Parish and Town Councils</u></p> <p>69. There needs to be a focus on retrofitting existing buildings as much of the housing stock in 2050 will consist of buildings that exist today.</p> <p><u>Local environmental organisations</u></p> <p>70. The Position Statement should have a far wider scope and be much more supportive of renewable energy schemes of all varieties.</p> <p>71. Given the great need for increased renewable energy generation and the enormous potential for this in Dorset and off its coast, we think this Position Statement and supporting information should be far more wide-reaching, positive and specific.</p> <p>72. The Local Plan definition of renewable energy should be included in the document.</p> <p>73. 1.1.26. - Transport and infrastructure issues need to be addressed.</p> <p><u>Local community organisations</u></p> <p>74. 1.1.17, 1.1.20 – lack of evidence that these statements are being followed.</p> <p><u>Parish and Town Councils</u></p> <p>75. Would like to know how carbon neutral technology could be incorporated into affordable developments due to high cost of the technology.</p> <p>76. Include information on Local Energy schemes.</p> <p><u>Businesses</u></p> <p>77. Minerals developments are not featured in this document suggesting these developments are not subject to this guidance.</p> <p>78. Would like the overarching policy to include more context specific to Dorset such as there being no motorway, meaning there should be a greater importance on natural beauty.</p>	<p>67. The position statement sets out that in the context of climate change, building efficiency will be a consideration in the planning process. Restoration of green infrastructure is also a consideration that can already be given weight, on a case by case basis.</p> <p>70, 71. The position statement has a focus on the types of schemes where it is considered to be most effective for the council area – i.e. large scale solar farm proposals. We recognise that other renewable energy schemes have a benefit in terms of addressing climate change and therefore the position statement can still be relevant in the determination of such applications.</p> <p>73. Transport and infrastructure issues are best addressed through the production of strategic documents such as the Local Transport Plan, and the Dorset Council Local Plan. However the council will include an additional section in the sustainability checklist relating to access to public transport and active travel.</p> <p>74. The aim of the position statement is to ensure that climate change is appropriately and consistently considered by applicants and decision makers.</p> <p>75. Whilst building costs may be currently higher for net-zero ready buildings this can be offset by the fact they are cheaper to use in terms of not requiring as much energy to heat or cool. Therefore, even affordable housing developments can benefit from incorporating energy efficiency measures. Reference will be included in the position statement to highlight the cost benefits for energy efficient buildings.</p> <p>76. Applications for localised energy generation would fall within the scope of the position statement where they are considered to be a larger scale standalone renewable energy scheme. Reference to localised energy generation will be added to the document to make this clear.</p> <p>77. Mineral planning is covered by the Minerals Strategy (2014) which includes a policy requiring the preparation of a climate change assessment for minerals applications (Policy CC1).</p> <p>78. This is outside of the scope of the position statement as it doesn't seek to address strategic transport related issues, which are better addressed through the Local Transport Plan. The approach to development within the AONB as set out within the position statement reflects national planning policy. Any deviation from this approach would need to be within a development plan document and subject to further evidence and examination.</p>
<p>Status (1.1.23. – 1.1.27.)</p> <p><u>Local community organisations</u></p> <p>79. 1.1.27 – lack of evidence that these statements are being followed.</p> <p>80. 1.1.26. - should acknowledge that rural areas are unsustainable for development as they require private vehicle usage.</p> <p>81. Would like to see an analysis of the impact of the document in a few years' time.</p> <p><u>Developers/landowners/agent</u></p> <p>82. Lack of reference to Minerals development throughout the document – suggestion therefore that this form of development has been excluded from the interim guidance and position statement.</p>	<p>79, 81. The aim of the position statement is to ensure that climate change is appropriately and consistently considered by applicants and decision makers. We will consider the documents' effectiveness as part of developing new policy for the Local Plan.</p> <p>80. The position statement acknowledges that sustainability of location is one of the primary concerns when considering sustainable development, however it does not specifically address this issue as this is already done within the adopted local plans.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
	<p>82. Mineral planning is covered by the Minerals Strategy (2014) which includes a policy requiring the preparation of a climate change assessment for minerals applications (Policy CC1).</p>
<p><i>Why not wait for future standards on energy performance of new buildings? (1.1.28. – 1.1.31.)</i></p>	
<p><u>Public responses</u> 83. Need for funding to improve insulation in existing homes. 84. Action must happen quickly. <u>Dorset Council Cllrs</u> 85. Suggests the 2008 Act could be used in 1.1.31.</p>	<p>83. Improving insulation in existing homes does not normally require planning permission and therefore is outside of the scope of this document. 84. In addressing climate change on an interim basis prior to the adoption of the Dorset Council Local Plan, the position statement aims to take the best possible action given the current context of adopted local plan policy. 85. This is not considered necessary here.</p>
<p><i>Legislative Context (1.2.1. – 1.2.6.)</i></p>	
<p><u>Local environmental organisations</u> 86. Notes that public finance is a major driver of adaptation and policy must be dynamic to deal with uncertainty. <u>Dorset Council officers</u> 87. 1.2.6 - concerned that evidence cannot be seen of this happening through personal observations of new developments. 88. Regulations have become too onerous on prospective developers. 89. Concern with impact on viability and delivery of housing.</p>	<p>86. Noted. 87. Existing adopted local plan policies do not require developments to exceed national standards for energy efficiency and therefore most current developments will likely not be doing this. The aim of the position statement and checklist is to raise awareness of the issue and promote more energy efficient new buildings. 88. The regulations are set nationally. 89. If an applicant deems it unviable to meet the best practice objectives stated in the sustainability checklist, alongside other policy requirements, they should state this when completing the checklist so that an officer can consider the reasoning.</p>
<p><i>National policy context (1.2.7. – 1.2.30.)</i></p>	
<p><u>Public responses</u> 90. Need to address the lack of electricity supply that is a consequence of insufficient mining which will be needed for EV charging and heat pumps. <u>Local community organisations</u> 91. 1.2.10 – concern that building orientation isn't well understood by developers 92. 1.2.30. - Language should be changed. <u>Local environmental organisations</u> 93. Would like the importance of agricultural land for food production to feature more in the overarching policy section. <u>Parish and Town Councils</u> 94. Oil boilers need to be mentioned in 1.2.28. 95. 1.2.29. - Concerned that heat pumps are not shown to be efficient yet in retrofitting. 96. Given that the national policy context has barely changed since 2015 and was inadequate at that time, it is not sufficient to align to the national policy context. <u>CPRE</u> 97. Although the existing policy framework is strong this needs to be translated into action – and standards and internal targets needs driving up beyond those adopted nationally. <u>Businesses</u> 98. Look to the UK Green Building Council Net Zero Framework for reference, and the creation of the UK Net Zero Carbon Building Standard.</p>	<p>90. This is beyond the scope of the Position Statement. 91. It is intended that the Position Statement and Sustainability Checklist will highlight this consideration early on. 92. The language used is considered appropriate, however the word 'important' will be deleted as all material considerations are part of the planning balance. 93. This is not considered necessary. 94. It is currently uncertain what the Government stance on new oil boilers will be. 95. Noted, however this sets out what is already in the Health and Buildings Strategy. 96, 97. Any approach differing from the national policy context will need to be tested through the examination of a Local Plan. 98. Noted. We will consider the progress of these documents.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<i>Local policy and development plan context in relation to climate change (1.2.31. – 1.2.35.)</i>	
<p><u>Local environmental organisations</u> 99. NFU strategies on Integrated Water Management will help the Council's aim to adapt to climate change faster.</p> <p><u>Parish and Town Councils</u> 100. Need to do more to acknowledge Neighbourhood Plans and to give particular attention to those cases where town and parish councils have adopted Climate and Ecological Emergency Strategies on the basis of their Neighbourhood Plan. 101. It would be desirable if the best aspects of the individual former local requirements were mandated for the whole of the amalgamated Dorset council area. 102. Supplementary Planning Documents need to be mentioned in 1.2.31.</p>	<p>99. Noted.</p> <p>100. Agreed, reference to neighbourhood plans will be added. 101. Agreed, this may be appropriate. However new policy approaches for the Dorset Council area will be tested through the new Dorset Council Local Plan, based on appropriate evidence. 102. Noted. Reference to Supplementary Planning Documents will be added to the relevant paragraph.</p>
Sustainable Design and Construction – Local and National Policy Context	
<i>Local policy and development plan context in relation to sustainable construction and design (Position Statement 1)</i>	
<p><u>Public response</u> 103. Paragraph 2.1.9 - water use and surface water are critical considerations in Shaftesbury on top of the hill.</p> <p><u>Parish and Town Councils</u> 104. Para 2.1.16 - The adopted standards should be at least equal to the standards from the local plans of the former Dorset Area councils that are best able to ensure net zero and other sustainability standards.</p>	<p>103. Shaftesbury is covered by the North Dorset Local Plan (Policies 3 and 13 cover these matters).</p> <p>104. Any new standards will be tested and set through the new Dorset Local Plan, based on appropriate evidence.</p>
<i>Demonstrating sustainable design and construction measures (Position Statement 1)</i>	
<p>105. Reasoning for BREL reports understood 106. Paragraph 2.1.21 requires builders to complete Part L (BREL) reports at the design stage as well at the completion stage. At present BREL reports are only undertaken once planning permission has been granted and working drawings have been commissioned or further details are required as part of discharge of conditions. 107. Unnecessary and unduly onerous to produce BREL report in advance of working drawings stage/in advance of planning permission being granted due to additional work required. This should be removed from the IGPS. 108. Existing sustainability statement work provides a wealth of information and includes SAP modelling and so BREL reports at application stage are unnecessary. 109. It's not actually possible to provide a 'predicted EPC' for a building from a planning level design, as all technical information is needed to able to run the SAP calcs and then make an EPC. 110. Applicants will not want to have a whole technical design done for a building without knowing if they have planning permission. 111. This requirement could hinder future affordable developments with additional costs and unnecessary delays and should be removed. 112. Requirements will unfairly favour major developers who use copy and paste housing designs (where the EPC is already known).</p> <p><u>Parish and Town councils</u> 113. Concern with whether targets set out by applicants will be delivered. 114. 2.1.21 – query what happens if what is planned is not achieved in terms of energy efficiency? 115. Para 2.1.18 The predicted EPC requirement should be mandatory for all but the most trivial householder applications. 116. Para 2.1.21 It would also be helpful if Building Control could publish some statistics on the EPC and Average Improvement arising from modification of existing buildings and the average EPC of new homes completed each year, or a count of the number of new homes completed each year with (1) a rating of C; (2) a rating of B or better and (3) a rating of D or worse.</p> <p><u>Sport England</u> 117. Need to consider upskilling of consultants – suggest creating a series of seminars to help sole consultants understand and prepare for creating more sustainable buildings.</p>	<p>105. Noted. 106-112. There will be a need for developers to produce BREL reports and predictive EPC assessments during the detailed design and building control stages of development, and therefore it is not considered unreasonable for this information to be supplied at the earlier planning stage where it can help to demonstrate energy efficiency measures. However, it is noted that it may not be practicable to supply this information in all cases and therefore the position statement will be amended to reflect this.</p> <p>113. Where there is a firm policy backing to a best practice objective, and where deemed necessary then planning conditions may be applied which must be adhered to. In other cases, where objectives are not mandatory, planning conditions may not be appropriate, however this will be considered on a case by case basis. 114. Where planning conditions for objectives are applied these are enforceable. Conditions are unlikely to be appropriate regarding energy efficiency however developments will need to be built to any specification set out in a planning application. 115. The checklist will cover most planning applications where new buildings or changes of use are proposed, as well as where there are significant extensions. Due to the varying scale of householder applications (many being of very limited scope), it is felt it would be too onerous to require a checklist for this application type. It would also be unreasonable to require information regarding net zero credentials for a site which aren't related to the work being proposed. 116. It is agreed that this information will be useful in understanding the energy performance of the existing and new building stock in the council area. This comment will be passed to the Building Control team for consideration.</p> <p>117. The council will consider offering training however there are many existing training opportunities relating to improving the sustainability of buildings.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
Position Statement 1 - Sustainable Design and Construction	
<i>Point 1 - The weight to be given to Climate Change as a material consideration</i>	
<p>118. The statement that “Dorset’s declaration of a climate emergency and the Dorset Council Natural Environment, Climate and Ecology Strategy...will be given weight as a material consideration in planning decisions” suggests that applicants can 'off-set' some non-compliance with local planning requirements through adherence to some of these new guidelines.</p> <p><u>Developers/agents</u></p> <p>119. Climate change is a global effect due to human activity and not as phrased a material consideration in planning decisions - it is therefore not clear how this is to be interpreted by decision makers.</p> <p><u>Public response</u></p> <p>120. Concern that the application of significant weight will require actual enforcement, otherwise developers will easily circumvent this.</p> <p>121. Query the definition of 'weight'.</p> <p>122. It does not feel that climate change and sustainable issues will in fact carry any more weight in planning decisions than they currently do.</p> <p><u>Local environmental organisations</u></p> <p>123. The term 'significant weight' only has meaning in relation to their priority over other, conflicting material considerations and this relative priority isn't stated.</p> <p>124. Mitigating climate change also needs to be seen as more important and carrying more weight in planning decisions than it currently is.</p> <p><u>Parish and Town Councils</u></p> <p>125. Concern regarding the difference between “significant weight” and actual achievement.</p> <p>126. Concern with other 'material considerations' which will possibly outweigh the aspirations of these policies – for example heritage and visual impacts.</p> <p>127. Would ask that more guidance is provided on the relative weight of responding to climate change compared with protecting listed buildings is provided that encourages the buildings' energy efficiency.</p> <p>128. The terms 'significant weight' and 'material consideration' are too vague and come down to opinion which cannot be measured – query how 'weight' is quantified and measured?</p>	<p>118. This is not the case. All applications must be determined in accordance with the development plan unless material considerations indicate otherwise. However, all material considerations must be weighed up in the planning balance. The position statement is confirming that the climate emergency is one material consideration that should be part of the consideration of any application.</p> <p>119. This is true, but in this context we are saying that climate change should be taken into account by decision makers along with other material considerations.</p> <p>120, 121, 123, 124, 125, 126, 128. 'Significant weight' is something that the decision maker takes into account. Other considerations such as landscape, heritage, housing need may also be given significant weight, or may be given substantial, moderate or limited weight, depending on the case.</p> <p>122. The purpose of the position statement is to confirm that decision makers should be giving weight to climate change.</p> <p>127. The amount of weight to be given to each policy and material consideration depends on the case. It is up to the decision maker to attribute weight in accordance with any national and local policy requirements.</p>
<i>Point 2 – the weight to be given to the Dorset Council Natural Environment, Climate and Ecology Strategy</i>	
<p><u>Public response, Parish and Town Councils</u></p> <p>129. Should be strengthened to give "significant weight" not just "weight" as per para 1.</p> <p><u>Parish and Town Councils</u></p> <p>130. This is completely worthless if the intention is to stay aligned to an inadequate national policy context.</p>	<p>129. Noted. Paragraph 1 of the Position Statement on Sustainable design and construction sets out that 'significant weight' will be given to the issue of climate change. In order to clarify the approach, this paragraph will be combined with paragraph 2, to set out that regard will be had to the Dorset Council Natural Environment, Climate and Ecology Strategy when considering this issue in the planning balance.</p> <p>130. At this point we are unable to go beyond national policy requirements, however this will be considered through the new Local Plan.</p>
<i>Point 3 – relevant types of development</i>	
<p><u>Public response, Parish and Town Councils, Local environmental organisations</u></p> <p>131. The requirement should apply to every planning and LBC application, without exception.</p> <p>132. Householder applications and certain non-residential proposals should be included.</p> <p>133. The Sustainability Checklist should apply to generation of renewable energy in domestic and commercial premises situations.</p> <p><u>Local environmental organisations</u></p>	<p>131, 132. The climate emergency does have relevance to these applications, however the submission of a checklist will not be required for householder applications since this is considered too onerous for the scale of development.</p> <p>133. As the checklist will be a requirement for most new buildings and some developments comprising changes of use applicants will be required to submit details of renewable energy generation associated with their proposal.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p>134. Concern with confusion arising from footnote relating to para 39 of the Local List – there is no set of exemptions in the new para 39. Footnote should be amended to reflect this.</p> <p>135. 2.1.17 – suggestion that all developments should be designed to net zero standards, regardless of their scale and nature.</p> <p>136. 2.1.18 - it is essential that existing poor residential and non-residential buildings are improved as quickly as possible - Householder applicants should be required to respond to specific questions on the Checklist and provide a Sustainability Statement which expands on those responses.</p> <p><u>Local community organisations</u></p> <p>137. "Significant weight" linked to 3. "conversions to existing buildings" - is inconsistent and open to interpretation.</p> <p>138. Concern that the statement is woolly and ineffectual - sends the wrong message that climate mitigation is optional in the built environment.</p> <p>139. The climate doesn't affect different buildings according to their human assigned designation in the planning terms.</p> <p><u>Parish and Town Councils</u></p> <p>140. Footnote 27 – clarification needed on 'certain non-residential developments'.</p> <p><u>Businesses</u></p> <p>141. Consider including mineral planning in the scope of the checklist.</p>	<p>134, 140. The wording of the footnote will be amended for clarification.</p> <p>135. Other considerations such as viability mean it may not be possible for all developments to be designed to net zero standards, particularly where they are smaller in scale. The checklist is designed to encourage best practice wherever possible rather than enforce net zero.</p> <p>136. Householder applications are encouraged to address the considerations set out in Paragraph 39 of the Local List.</p> <p>137. The position statement will be amended as the climate emergency can be relevant to all types of development.</p> <p>138. The statement confirms that climate change must be taken into consideration in local decision making. It encourages best practice in terms of climate change mitigation in relation to buildings in the absence of stronger Building Regulations and adopted policies.</p> <p>139. Agreed, however a proportionate approach is necessary.</p> <p>141. Mineral planning is covered by the Minerals Strategy (2014) which includes a policy requiring the preparation of a climate change assessment for minerals applications (Policy CC1).</p>
Point 4 - the carbon neutral or low carbon credentials of a development	
<p><u>Local environmental organisations</u></p> <p>142. The term 'viewed positively' only has meaning in relation to their priority over other, conflicting material considerations and this relative priority isn't stated.</p> <p><u>Parish and Town Councils</u></p> <p>143. Should be materially strengthened and made a requirement or as close to a requirement as is legally allowed.</p> <p><u>Businesses</u></p> <p>144. Any definitions for 'net zero' development need to be aligned with industry standards.</p> <p>145. Concern with impacts of requirements on bespoke and tailored designs made with care for the setting – such as AONB.</p> <p><u>Dorset Council officers</u></p> <p>146. Energy efficiency targets should be introduced now to save needing to retrofit new buildings.</p> <p>147. Lack of information about whether the lack of good net zero credentials will lead to applications being rejected.</p>	<p>142. This is part of the planning balance that is made on a case by case basis. Relative priority depends on the policy and issues relevant to that case.</p> <p>143, 146. It is not possible to make net zero a requirement without Building Regulations or national policy stipulating this, or without developing a local policy for this.</p> <p>144. Agreed. A definition of 'net zero' will be added to the position statement.</p> <p>145. Any low carbon aspects should be built into the design, taking into account what is appropriate for the setting and location.</p> <p>147. Net zero is not currently a policy requirement and so applications cannot be refused on this basis.</p>
Point 6 – the status of the Sustainability statement and checklist for planning applications	
<p><u>Local environmental organisations</u></p> <p>148. The phrase in para 6 ought to be 'must submit' rather 'should submit', as it will be a requirement to submit a statement and checklist.</p> <p><u>Parish and Town Councils</u></p> <p>149. If the checklist and statement will be material, there is a need for applicant/developer to do more than just a "tick box" exercise. Outcomes must be achievable and seen to be achievable at the planning application stage.</p>	<p>148. The requirement is set out in the Local List.</p> <p>149. The Position Statement and Checklist will not in themselves be material considerations in decision making. The aim of the Position Statement is that it provides guidance on how the issue of climate change will be considered in decision making on planning applications, based on existing adopted policies, to help ensure consistency. The checklist will enable applicants to set out how they are considering climate change (as a material consideration) in their proposals and will assist the Council in consider the level of weight that can be given to the low carbon credentials of a development, and the contribution it is making towards national and local objectives for addressing climate change. The Position Statement will be amended to clarify this.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p><i>Point 7 – the weight to be afforded to net zero development</i></p> <p><u>Public response, Local environmental organisations</u> 150. In terms of the amount of weight to be afforded to net zero development, it is one consideration as part of a balanced scorecard and not to be considered in isolation – priority needs to be stated.</p> <p><u>Public response</u> 151. The environmental considerations do not trump everything else.</p> <p><u>Local environmental organisations</u> 152. Clarification needed on how levels of compliance with targets will inform decision making.</p> <p><u>Local community organisations</u> 153. Concern that the Council may not be able to assess applications adequately in relation to this. 154. Concern with reliance on applicants’ consultants for assessment, in house skill is needed.</p> <p><u>Parish and Town Councils</u> 155. 7b - measures to incorporate carbon neutral technologies must be applied to the affordable or social housing as well as the open market housing - so that those who cannot afford to retrofit carbon reduction technologies will benefit. 156. This is not positioned strongly enough against those that don’t comply and could.</p>	<p>150, 151. Agreed.</p> <p>152. The checklist will enable applicants to set out how they are considering climate change (as a material consideration) in their proposals and will assist the Council in consider the level of weight that can be given to the low carbon credentials of a development, and the contribution it is making towards national and local objectives for addressing climate change. The degree to which a proposal incorporates measures to achieve the best practice objectives set out in the checklist will be considered. Where sustainable design and construction measures are proposed in order to meet the best practice objectives, this will be viewed positively as part of the overall planning assessment against the development plan and relevant material considerations. The Position Statement will be amended to clarify this.</p> <p>153, 154. It is considered that the Council will have sufficient in-house expertise to assess applications in relation to sustainable design and construction, for the majority of cases. For more complex cases, the Council will consider using external consultants to help assess applicants’ submissions, as well as exploring options for training its staff.</p> <p>155. The checklist is required to any relevant application as set out in the Local List.</p> <p>156. As the best practice objectives for energy efficiency are largely not mandatory due to them not being required by adopted policies, it will not be possible to penalise those who don’t comply. However the aim of the checklist is to assist the Council in consider the level of weight that can be given to the low carbon credentials of a development, and the contribution it is making towards national and local objectives for addressing climate change. The degree to which a proposal incorporates measures to achieve the best practice objectives set out in the checklist will be considered. Where sustainable design and construction measures are proposed in order to meet the best practice objectives, this will be viewed positively as part of the overall planning assessment against the development plan and relevant material considerations. The Position Statement will be amended to clarify this.</p>
<p><i>Additional points for Position Statement 1</i></p> <p><u>Historic England</u> 157. It would be beneficial if the statement incorporated an additional point relating to the existing building stock. 158. This could provide qualified support for proposals that would involve:</p> <ul style="list-style-type: none"> • The reuse of existing buildings, having regard to their embodied carbon, especially when these are of historic significance, • The sensitive conversion or retrofit of existing buildings, incorporating measures such as insulation and energy efficient fixed services, • The fitting of renewable and low carbon energy installations to existing buildings (or adjacent land), such as heat pumps and solar panels, in appropriate locations having regard to the building and its context, • Recognition that there are particular considerations when dealing with historic buildings and buildings or traditional construction, which often require retrofit measures to be applied differently, • Signposting relevant guidance including that relating to historic buildings. <p><u>Local community organisations</u> 159. Emphasise the importance of homes that provide good health and comfort for people with disabilities.</p>	<p>157, 158. It is not intended to include an additional point regarding existing building stock as in most cases works to retrofit buildings would not require planning permission and therefore would not be subject to the position statement or requirement to submit a sustainability statement and checklist. Where works will require planning permission and they include sustainable design and construction measures, the position statement will apply.</p> <p>159. This will be addressed through the Dorset Council Local Plan.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
Renewable energy - Local and national policy context	
<p>160. The Grid should be extended to suit required development rather than limiting the locations of any developments to suit the Grid.</p> <p>161. The well established need for renewable energy must be balanced against potential problems, which must be fully addressed in each case, and given due weight.</p> <p>162. Risks and hazards associated with renewable energy proposals such as battery energy storage systems need to be included in the consideration of proposals and consultation carried out with appropriate authorities.</p> <p>163. Visual and landscape impacts – Consideration should not be confined to designated landscapes such as AONBs as other areas are of comparable quality.</p> <p><u>CPRE</u></p> <p>164. Section doesn't mention carbon capture and storage or nuclear power.</p> <p>165. It is stated that community benefits such as community ownership are not a material consideration. To give schemes that benefit local people directly, and are most likely to be supported by the local community, no weight seems perverse.</p> <p><u>CCAONB</u></p> <p>166. The document recognises the sensitivity of Dorset's environment and the AONB agrees provision of large scale energy generation facilities are unlikely to be achievable in the county.</p>	<p>160. This is beyond the role of the planning authority.</p> <p>161. Agreed. This is confirmed in point 2 of Position Statement 2.</p> <p>162. The Local Planning Authority consults with Environmental Health colleagues and the HSE as standard practice when necessary. Risks and hazards would be part of the consideration of any such proposal.</p> <p>163. Agreed. Applications will need to respond to adopted policies relating to landscape.</p> <p>164. This is beyond the scope of this document.</p> <p>165. Case law has established that such community benefits cannot be a material consideration.</p> <p>166. The position statement doesn't say this, any application would need to be assessed on its merits, taking into account the sensitivity of the environment, including the AONB where relevant.</p>
Benefits of renewable energy development	
<p><u>Developers/landowners/agent</u></p> <p>167. Energy production on its own is likely not enough to be considered a 'public good' – people will be against the appearance of solar farms in the landscape.</p> <p><u>Local environmental organisations</u></p> <p>168. Urge considerable weight be given to public dis-benefits of any such proposals.</p> <p><u>Local environmental organisations, Local community organisations, Parish and Town Councils</u></p> <p>169. 3.2.11 – community benefits (e.g. community ownership/shares) should be material considerations.</p> <p>170. The best community scheme is one in which local people benefit directly and these are the schemes which are most likely to be supported by the local community. So, to give such schemes no weight (when they should be encouraged) is entirely wrong.</p> <p>171. Community benefits may make a scheme more locally acceptable.</p> <p><u>Local community organisations</u></p> <p>172. Concern that if community benefits aren't considered we will stifle and ignore local grassroots initiatives and learning re climate change mitigation and it will seem to be someone else's responsibility solely.</p> <p>173. 3.2.12 This says onshore wind requires community backing, therefore community is deemed central to policy.</p>	<p>167. Renewable energy production is a public benefit and will be considered as such. This will be weighed against any impacts in accordance with national and local policies.</p> <p>168. The weight attributed to any negative impacts will be determined on a case by case basis in accordance with national and local policies.</p> <p>169, 170, 171. Case law has established that such community benefits cannot be a material consideration.</p> <p>172. Agreed.</p> <p>173. Agreed.</p>
Other benefits of renewable energy development	
<p><u>Developers/landowners/agent</u></p> <p>174. Additional benefits compatible with solar farms must be proposed alongside the development - reinstatement of lost walking routes/bridleways (see Ramblers: Don't Lose Your Way), creation of new cycling and walking routes, addition of wildlife habitats/nature reserves and reinstatement of hedgerows, tree planting, wetlands and meadows.</p>	<p>174. Such benefits may be considered on a case by case basis.</p>
The AONB has the highest status of protection	
<p><u>CCAONB</u></p> <p>175. Paragraph 3.3.17 avoids committing the Council to giving the AONBs the 'highest status of protection' – this commitment should be explicitly stated. Point d of 3.3.6 should also refer more explicitly to NPPF 176.</p> <p>176. Mention that footnote 60 of the NPPF gives the decision maker the discretion to categorise developments smaller than the NPPF glossary definition of major as major.</p> <p>177. The sentence 'Consideration will also be given to the amount of the council area that is itself designated as AONB' should be removed.</p>	<p>175. The paragraph states the Council will give great weight to the conservation and enhancement of AONBs in line with paragraph 176 of the AONB. National policy already gives AONBs the highest status of protection.</p> <p>176. An amendment will be made to reflect this.</p> <p>177. This section will be amended to clarify the approach.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p><i>Impacts on the AONB</i></p> <p><u>Developers/landowners/agent</u></p> <p>178. 3.2.17 In considering the impact of a renewable energy scheme on an AONB some thought should be given to the likely impact on that AONB of climate change continuing unabated.</p> <p>179. If temperatures continue to rise and rainfall patterns change, some/much of our native flora will no longer be suited to the environment they find themselves in - Native species will be lost and exotics will become stronger - 'saving' the AONB from a renewable energy scheme may be a short term gain for a long term loss.</p> <p>180. Concern that the approach represents an AONB Nimby Charter and is not an appropriate response in a time of climate emergency.</p> <p>181. AONB is not truly a 'natural' setting but rather a heavily man-made one.</p> <p><u>Local environmental organisation</u></p> <p>182. Some solar parks have been permitted in the AONB and small scale community projects such as the one proposed for Martinstown should also be supported.</p> <p><u>Parish and Town Councils</u></p> <p>183. Some of the AONB boundaries are very dated – 1950s. If AONBs are to have a significant role in influencing planning decisions then the AONB boundaries need to be positively reviewed.</p> <p>184. In the case of Stinsford Parish Council's administrative boundary, the AONB boundary needs to be brought south to include much of the parish.</p> <p>185. Many areas of AONB are indistinguishable from land outside the AONB.</p> <p>186. Must be clear that while heritage sites and AONBs are important and should be protected, the existential threat of climate change means that we will likely have to have a higher degree of compromise on the high levels of protection that they have enjoyed in the past.</p> <p><u>Dorset Council Cllrs</u></p> <p>187. There should be a blanket ban on ground mounted solar developments in AONBs - AONB's are already poorly protected and the statement effectively invites applicants to look for exemptions.</p> <p>188. AONBs will suffer extreme degradation with climate chaos and global heating.</p> <p>189. A massive programme of wind farms, on shore, off shore , tidal turbines should be granted permission regardless of AONB.</p>	<p>178, 179, 180, 181. The approach reflects national planning policy and legal protection of AONBs. Whilst the comments are noted it is outside of the scope of the position statement to address these additional issues at this time as this would deviate from national policy. The Position Statement does however confirm that addressing climate change is seen as a public benefit.</p> <p>182. Noted.</p> <p>183, 184, 185. The review of AONB boundaries is beyond the remit of the local planning authority.</p> <p>186. The legal protection and national policy status of AONBs and designated heritage assets is unchanged.</p> <p>187, 188, 189. Applications for solar farms are considered on a case by case basis. Location within an AONB doesn't rule them out, however there are more stringent policy requirements and tests.</p>
<p><i>Grid capacity</i></p> <p><u>CPRE</u></p> <p>190. Grid capacity is a significant problem – insufficient capacity and connection points and no plan to address this. Hybrid solutions allowing localised energy generation and access to power from the Grid should be supported more clearly in Dorset's policies.</p> <p><u>CCAONB</u></p> <p>191. Implication that cost of electricity connection to the network could override the protection of an AONB or AONB setting location – which is inappropriate.</p> <p><u>Local environmental organisations</u></p> <p>192. Para 3.2.13 - text is too dispiriting - suggest a more upbeat message that is realistic - “applicants need to be mindful of the current connection constraints and apply pressure to get them sorted whilst planning the timeframe for success”.</p> <p>193. Dorset Council must state they welcome such initiatives looking to the future when any infrastructure electricity network constraints are removed.</p> <p>194. 3.2.13 - Grid capacity is a significant problem with insufficient capacity and connection points and no plan to address this.</p> <p>195. There are wider issues as to whether the grid should be made more local and less national.</p>	<p>190, 194. The ability to address existing grid capacity issues is outside the direct control of the local planning authority. The council submits information and feeds back to the District Network Operators regarding issues, who will then plan for network improvements to meet future demand.</p> <p>190. Applications for localised energy generation would fall within the scope of the position statement where it is considered to be a larger scale standalone renewable energy scheme. Reference to localised energy generation will be added to the document to make this clear. Strategic approaches to localised energy will be considered through the Dorset Council Local Plan.</p> <p>191. The position statement identifies that applicants would need to justify a site's location in the AONB, with availability of grid connection being one of the potential considerations. Part of the assessment relates to consideration of the costs associated with developing outside of the AONB compared to inside the AONB (in accordance with para 177(b) of the NPPF). These issues would be considered on a case by case basis.</p> <p>192. Noted – the existing paragraph wording is considered to be appropriate for a guidance document.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
	<p>193. Noted – planning applications are determined on the basis of the current context, including that of grid capacity. Should the situation regarding the electricity network change in the future the position statement can be updated to allow for any change in considerations.</p> <p>195. Noted.</p>
<p><i>Consideration of alternatives in an AONB</i></p>	
<p><u>Dorset AONB</u></p> <p>196. Part b of NPPF 177 test. A developer typically identifies a preferred point of grid connection and presents evidence in relation to this. However, it is arguable that this does not fulfil the exceptional circumstances test fully at least without evidence that the preferred connection point is necessary due to specific capacity issues, lack of constraints. Outcome of the forthcoming Inquiry in relation to Crupton Solar Farm should be taken into consideration. Lepe Road appeal decision (2016) should also be taken into consideration.</p> <p><u>Parish and Town Councils</u></p> <p>197. There is a need to consider the viability of industrial scale developments outside of the AONBs from within the AONBs.</p>	<p>196. Noted. The outcome of the Crupton Solar Farm application is currently not known but will be considered once determined. The Lepe Road decision will be considered and referenced if considered appropriate. The wording of paragraph 3.2.22 will be amended to clarify the need to include information on specific capacity issues and constraints.</p> <p>197. Paragraph 3.2.21 as drafted confirms that the council will have regard to the setting of the AONB when assessing proposed development outside of the designation. Issues of viability will be considered when assessing the scope of developing outside of the AONB under paragraph 177 (b) of the NPPF, as set out in paragraphs 3.2.21-3.2.22 of the position statement.</p>
<p><i>Impacts on landscape in general/non-designated landscapes</i></p>	
<p><u>Public response</u></p> <p>198. Protection of designated landscapes should not be at the expense of non-designated landscapes which may be of greater local, community, or even national importance, and may necessitate equal status due to other valued attributes.</p> <p><u>Local environmental organisations</u></p> <p>199. There needs to be a compromise between enjoyment of landscape assets in their natural state and the need to protect them in the longer term from the consequences of climate change.</p> <p><u>Parish and Town Councils</u></p> <p>200. It is worth reflecting that we should not lose sight of the long term impacts on the local environment of solar projects.</p>	<p>198. Impacts on landscape must be considered in accordance with national policy, which places greater protection on designated landscapes such as AONBs. However, any scheme is considered on a case by case basis in accordance with adopted policies including on local landscapes.</p> <p>199. This is taken into consideration through the consideration of the overall public benefits of renewable energy schemes.</p> <p>200. Adverse impacts on the environment should be mitigated to an acceptable level and considered as part of the planning balance.</p>
<p><i>Heritage impacts</i></p>	
<p><u>Developers/landowners/agent</u></p> <p>201. Para 3.2.5 - Local plan policies also include conservation areas and non-designated heritage assets as well as all the other impacts already referred to in this list.</p> <p><u>Historic England</u></p> <p>202. In relation to the legal duty to have special regard to conservation of listed buildings, we suggest that the text ‘and their settings’ is added to be consistent with s66 of the Act.</p> <p>203. The s77 duty in relation to conservation areas could also be mentioned here.</p> <p>204. Paragraph 3.2.29 - It is important to recognise that less than substantial harm is a broad category that includes a range of possible levels of impact and that each case will need to be considered on its own merits - To help you make this a robust document, we therefore suggest that the first sentence in this paragraph could be removed or amended, to avoid any risk of misinterpretation.</p> <p><u>Public response</u></p> <p>205. Everything, without exception, should have greater weight on climate change. Suggests there is little point conservation of heritage assets if they are all that's left.</p> <p><u>Local environmental organisations</u></p> <p>206. There needs to be a compromise between enjoyment of heritage assets in their natural state and the need to protect them in the longer term from the consequences of climate change.</p>	<p>201. Agreed. Proposals will need to be considered in accordance with adopted local policies.</p> <p>202. The text will be amended as suggested.</p> <p>203. The text will be amended as suggested.</p> <p>204. The sentence will be removed to avoid confusion.</p> <p>205. Conservation of heritage assets needs to be in accordance with legislation and national policy.</p> <p>206. This is taken into consideration through the consideration of the overall public benefits of renewable energy schemes.</p> <p>207. Applications for solar farms are considered on a case by case basis by the local planning authority, or at appeal by the planning inspectorate. Heritage impact will be considered where relevant in the balance of benefits and impacts by the decision maker(s).</p> <p>208. This is beyond the scope of this document.</p> <p>209. Agreed, this is reflected in paragraph 3.2.25.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p><u>Parish and Town Councils</u></p> <p>207. Concern with recent appeal decision to site a solar farm at Park Farm in the parish of Motcombe in the Gillingham Royal Forest area - not a suitable location - hope that Dorset Council have learned lessons from this decision to help protect historic sites and countryside adjacent to urban development from future similar applications.</p> <p>208. Many Listed Buildings are in a state of disrepair.</p> <p>209. Not all listed buildings are of equal weight.</p> <p>210. 3.2.14 - The listed building element of the document firmly illustrates a complete lack of creativity and engagement with the possibilities for climate change improvements, taking the easy option of no change.</p> <p>211. Para 3.2.5 - Conservation areas and other historic character settings should be added.</p>	<p>210. Disagree. We have also prepared another guidance document advising how people can make improvements to their listed buildings to help with energy efficiency etc.</p> <p>211. This is covered under 'heritage assets.'</p>
<i>Impact on agricultural land from renewables development</i>	
<p><u>Public response</u></p> <p>212. Loss of agricultural land should be considered. Solar farms can result in loss of large areas. Lower graded soils are still of value for food production.</p> <p>213. Farming and recreation are more important goals than solar generation.</p> <p><u>Businesses</u></p> <p>214. Solar farm owners will give lip service to having livestock in the same fields as these panels, but in reality, they won't over concerns of damage to the panels - alternative multi-use and public-benefitting solutions must be found.</p> <p>215. Suggests that the consideration of agriculture land is particularly important and use of agriculture land should be actively discouraged.</p> <p><u>National Farmers Union</u></p> <p>216. There is a need to strike a balance between food security and climate ambitions.</p> <p>217. It is important that large scale solar farm development is located on lower quality agricultural land, avoiding the most productive and versatile soils.</p> <p><u>CPRE</u></p> <p>218. Rooftop solar should be exploited before solar farms on new greenfield sites. CPRE recommends:</p> <p>219. Develop a "land-use framework" to consider competing demands on our finite agricultural land.</p> <p>220. Implementing roof-first planning policies that prioritise PV solar in areas already built on</p> <p>221. Changing regulations so that rooftop solar is a standard requirement for all new buildings.</p> <p>222. Providing government backed low-cost loans for homeowners & community groups for PV solar</p> <p>223. Invest in our electrical grid so that rooftop solar projects can be connected quickly and affordably.</p> <p>224. Encouraging communities to consider renewable energy schemes through rooftop solar audits and community visioning processes.</p> <p><u>CCAONB</u></p> <p>225. Conflicts with sustainability in food production and landscape character and quality do not appear to be considered.</p> <p><u>Local environmental organisations</u></p> <p>226. Develop a "land-use framework" to consider competing demands on our finite agricultural land.</p> <p><u>Parish and Town Councils</u></p> <p>227. Concern that Dorset Council does not consider prime agricultural land/green field as inviolate in terms of development - the national policy tests would probably not be applicable and certainly would not be enforceable on developers.</p>	<p>212, 215, 225, 226. This is covered in this section, however additional wording will be added in relation to the need to provide compelling evidence for proposals on best and most versatile land.</p> <p>213. Proposals must be assessed on their merits.</p> <p>214. There are solar farms with livestock grazing on site.</p> <p>216. Agreed.</p> <p>217. This section considers this and the grade of the agricultural land will be taken into consideration when determining a planning application.</p> <p>218 – 224. The provision of rooftop solar development is not directly within the scope of the position statement as in many cases such development is smaller in scale and can fall within permitted development rights. The position statement does not set a strategy or planning policy for the provision of renewable energy, it is intended to provide guidance to inform decision making on such applications, based on existing policy.</p> <p>226. The position statement does not set strategy or planning policy, it is intended to provide guidance to inform decision making on such applications, based on existing policy.</p> <p>227. Impacts on best and most versatile agricultural land are covered within the position statement, reflecting national planning policy and guidance.</p>
<i>Temporary nature of renewable energy development</i>	
<p><u>CCAONB</u></p> <p>228. Section 3.2.30-33 should be clearer</p>	<p>228. The section will be reviewed to ensure greater clarity.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p>229. Length of temporary period, as currently worded, solely related to life of technology and not to a human life span. Guidance should be clearer on this issue.</p>	<p>229. The section as originally drafted does consider human lifetime in respect to the lifetime of a development, however this will be made clearer in the re-drafting of the section.</p>
<p><i>Other impacts of renewable energy development</i></p>	
<p><u>Developers/landowners/agent</u></p> <p>230. Long term, solar is needed to bring everyone's energy bills down while still supplying for increasing electricity demand.</p> <p>231. The current generation is unlikely to see their energy bills drop due to the initial set-up costs of these places being offset onto the consumer.</p> <p><u>Local environmental organisations</u></p> <p>232. Para 3.2.5 - wish for more attention to be given to Noise. Noise is empirical yet often downplayed or forgotten until real nasty problems arise.</p> <p><u>Local community organisations</u></p> <p>233. No mention of the impact on public rights of way.</p> <p>234. Public rights of way can make an important contribution to climate change mitigation by encouraging travel on foot, horseback and bicycle.</p> <p>235. It should be remembered that Defra Circular 1/09 (paragraph 7.2) clearly states that the effect of a development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered.</p> <p><u>Parish and Town Councils</u></p> <p>236. Large scale renewable technologies can have negative implications for the local economy - this can have particularly severe implications where an economy is tourism based.</p> <p>237. National Design Guidance allows for access to green spaces. This can be inhibited by industrial scale renewables.</p> <p><u>Dorset Council Cllrs</u></p> <p>238. Consideration of views and house prices should be discounted.</p>	<p>230. This is a public benefit of such proposals.</p> <p>231. Noted.</p> <p>232. This is covered by existing policies on amenity and noise and is listed here.</p> <p>233, 234, 235. Impacts on public rights of way will be taken into consideration on a case by case basis.</p> <p>236. This would be taken into consideration in the planning balance on a case by case basis.</p> <p>237. Access to green spaces and rights of way are a consideration in the determination of planning applications, and such issues will be considered on a case by case basis.</p> <p>238. Agreed. These are not material considerations.</p>
<p><i>Solar energy technology</i></p>	
<p><u>Developers/landowners/agent</u></p> <p>239. 'Generation 1' of renewable equipment must be bought and used, in order for 'generations 2' and '3' with even better green credentials to come along and become affordable for purchase.</p> <p><u>Public response</u></p> <p>240. Query whether solar farms are a sensible way forward in our climate.</p> <p><u>Parish and Town Councils</u></p> <p>241. Consideration should be given to the sustainability and long-term ownership of solar sites, and to their classification in terms of future development.</p> <p>242. If a solar farm site is sold on by the original developer, are new regulations applied that may not have been in effect when the site was originally developed? Will the site, that might have been built on high quality green field land, be subsequently downgraded in terms of latitude for future development?</p> <p>243. It is often the case that wider geographies will be used as evidence of support to override the concerns of those directly impacted by a development.</p> <p><u>Dorset Council Cllrs</u></p> <p>244. 3.1.1 - A policy statement welcoming solar arrays, battery farms and wind turbines should be high priority.</p>	<p>239. Noted. The council is mindful that technology will likely improve quickly in the current context. The position statement can be updated in the future should changes in technology result in any necessary changes in how planning applications are considered.</p> <p>240. The council sees a significant number of planning applications for solar farm development. Should alternative technology come forward that represents an improvement on this form of renewable energy then the position statement can be updated accordingly.</p> <p>241, 242. The position statement confirms that the temporary nature of a solar farm is a consideration in decision making on an application, and that longer temporary periods may have increased impacts which will be considered. The statement also sets out site restoration conditions will be applied where appropriate.</p> <p>243. Planning applications will be considered on their own merits and on the basis of planning issues; not on the level of support/objection.</p> <p>244. The council aims to introduce planning policies regarding renewable energy development through the Dorset Council Local Plan. Currently the timescales and existing policy context means setting policies now isn't currently possible.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p><i>Brownfield locations for solar development</i></p> <p><u>Public response</u> 245. Suggestion to put solar panels on the roof of County Hall.</p> <p><u>Public response, National Farmers Union, Local environmental organisations, Parish and Town Councils</u> 246. Suggestion to include something about rooftop solar. 247. Suggestion to include something about incorporation of energy generation capacity on already developed sites. 248. Suggestion to incentivise renewable energy on brownfield sites. 249. Should use brownfield sites prior to greenfield sites.</p> <p><u>Local environmental organisations</u> 250. Statement is very limited in scope - does not mention opportunities for solar energy from PV panels on car parks. 251. Developing more PV solar on roofs (and local wind power) should be a good thing not only because it provides locally-sourced renewable energy but because it also removes some of the strain on the existing grid. 252. Suggest changing regulations so that rooftop solar is a standard requirement for all new buildings. 253. Provide government backed low-cost loans for homeowners & community groups for PV solar 254. Invest in our electrical grid so that rooftop solar projects are connected quickly and affordably. 255. Encourage communities to consider renewable energy schemes through rooftop solar audits and community visioning processes. For example those pioneered by the Centre for Sustainable Energy.</p> <p><u>Parish and Town Councils</u> 256. The Position statement makes no specific reference to the urban context such as in Dorchester, where renewable energy generation can take place on premises for immediate consumption by the premises occupier - domestic or commercial.</p>	<p>245. Noted. There are plans in place and work ongoing to make energy efficiency improvements to many of the council's buildings and to install solar panels where appropriate, including County Hall.</p> <p>246, 247. The provision of rooftop or brownfield site solar development is not directly within the scope of the position statement as in many cases such development is smaller in scale and can fall within permitted development rights. The position statement aims to address the larger application types so as to be most effective, and as such focuses on large scale standalone schemes. However, as noted in the position statement climate change will be a material consideration in planning applications in general and as such the benefits of such schemes in addressing climate change will be considered, when such an application is submitted.</p> <p>248, 253, 254. It is outside of the scope of the position statement to introduce incentives and investment in relation to development schemes or the electricity grid, as it this a guidance document for decision making on planning applications.</p> <p>249, 250, 256. The position statement does not seek to direct development towards brownfield or rooftop locations as it doesn't itself set policy or strategy for development. Introducing such strategies requires further evidence gathering and formal examination, for instance through the development of a local plan.</p> <p>251. Noted (see response to 246, 247)</p> <p>255. This is outside of the scope of the position statement, which is a guidance document for decision making on planning applications.</p>
<p><i>Wind energy</i></p> <p><u>Public response</u> 257. The obvious place for an onshore wind farm is Rampisham Down where nearly all the pylons that were there for about 60 years without complaint have been taken down.</p> <p><u>Local environmental organisations, Local community organisations, Parish and Town Councils</u> 258. 3.2.12 - It would be helpful if this paragraph could state the Council's intention to identify wind energy sites for inclusion in its new Draft Local Plan. 259. Lack of consideration of onshore wind 260. Need to identify areas for wind energy development 261. There could also be consideration for limited wind power projects – reference to Rampisham Down and Slyer's Lane area North of Dorchester as potential wind energy sites.</p> <p><u>Parish and Town Councils</u> 262. Point 8 and footnote 37 – suggestion that approach is too complacent. Need to assume that the emergency will require much more wind investment, and faster. 263. Paragraph 3.2.12 requires clarification about the geography involved in substantiation what constitutes 'community backing'. This is also unclear in the NPPF and may require legal interpretation. 264. It is often the case that wider geographies will be used as evidence of support to override the concerns of those directly impacted by a development. 265. Community Support should be demonstrable through voting for a Neighbourhood Plan in a Referendum particularly in relation to Wind Energy on an appropriate community scale.</p>	<p>257, 260, 261. National policy requires that suitable areas are set out through local policy and so this will considered in the new Dorset Council Local Plan. 258. Reference to this will be added. 259. This is noted however as set out in the position statement the current national and local planning policy context means that proposals for onshore wind energy are not coming forward at this time. Should the national planning policy context change then the position statement will be updated accordingly.</p> <p>262. This is the national policy context as it currently stands. 263. This depends on the case and is likely to be established by case law. 264. Any local impacts will need to be weighed against wider public benefits. 265. Noted. 266. There is still a requirement for appropriate areas to be identified within the development plan supplementary planning document. It is not the role of the position statement to do this. 267. This is potentially something that can be considered by the council in the future, it is outside the scope of the position statement.. 268. Agreed.</p>

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<p>266. Para 3.2.12 - should be extended to say that where a Neighbourhood Plan (which, once made, is part of the Development Plan) supports the development of appropriately scaled onshore wind energy development then this will be supported - the making of the Neighbourhood Plan is subject to a Public referendum which demonstrates community support as required by the NPPF.</p> <p>267. Would it be possible for Dorset Council to seek try to understand public opinion on the acceptability of wind energy developments in terms of say; aesthetics, energy cost, environment and ecology, through surveys and other public engagement.</p> <p>268. Para 3.2.12 - Small scale wind generation might prove acceptable, especially if the energy is available locally at advantageous rates.</p> <p><u>Dorset Council Cllrs</u></p> <p>269. Need more ambition and openness to large scale wind.</p>	<p>269. National policy requires that suitable areas are set out through local policy and so this will be considered in the new Dorset Council Local Plan.</p>
<p><i>Other renewable energy technologies to consider</i></p>	
<p><u>Sport England</u></p> <p>270. Playing fields can assist with this by putting ground source heat pumps under the playing fields to create sustainable forms of heating.</p> <p>271. The Department of Education are currently piloting several schools using this - but the scheme can be rolled out to recreation grounds and village greens.</p> <p>272. Playing fields are also great for being carbon zero.</p> <p><u>Public response</u></p> <p>273. Lack of reference to another possible alternative energy supply such as Small Modular Reactors - long been used by the Navy, has significant advantages over renewables.</p> <p>274. SMR takes up far less space and hence has far less visual impact and it avoids many of the problems associated with commodity shortages.</p> <p>275. Concern with recent application for a waste incinerator at Portland Port - appeared at a glance a reasonable idea but was a potential environmental.</p> <p><u>National Farmers Union</u></p> <p>276. Important to consider the need upgraded infrastructure in rural areas to enable the use of new technologies that support a net zero transition, including mobile and broadband access, electric vehicle charging points, fast tracking of electric grid network connections to enable decentralised renewable energy generation, battery storage and building modernisation.</p> <p>277. Hope to see development of greenhouse gas removal opportunities, including bioenergy with carbon capture, utilisation and storage, carbon storage in soils, hedges and trees, and greater use of long-lived bio-based substitute products and materials, all of which are likely to present additional income opportunities for agriculture through new markets and stacking of public and private finance.</p> <p><u>Local environmental organisations</u></p> <p>278. Para 3.2.10: district heating completely ties-in end users with one supplier and tariffs with little or no agency.</p> <p>279. With ever warmer winters district heating may have more disadvantages than benefits.</p> <p>280. The best solution is to insulate homes to provide both winter warmth and summer cooling. Planning should not support an excuse to allow a proposal that needs to dissipate unwanted heat.</p> <p>281. Statement is very limited in scope - does not mention offshore wind energy nor consider the contribution to renewable energy from household solar and wind turbines.</p> <p>282. Hybrid solutions which allow localised generation and access to power from the grid are surely the way to go and should be supported more clearly in Dorset's policies.</p> <p><u>Parish and Town Councils</u></p> <p>283. Need to consider all forms of renewable energy - Dorset Deserves Better Group have put forward some interesting suggestions to widen the scope of the Policy.</p>	<p>270, 271, 272. Noted.</p> <p>273, 274. It is acknowledged that other technologies will have a part to play in tackling climate change. However, to achieve maximum effect the position statement focusses on those technologies that are currently prevalent in the planning system in the council area. The position statement can be updated in the future according to any changes.</p> <p>275. This application was refused.</p> <p>276. Noted. Some of the listed aspects are subject to the councils Sustainability Checklist (also subject to the consultation), and others are covered by Building Regulations. The fast tracking of network connections is not within the remit of the council and network connections are handled by network operators. Battery storage is widely considered to be part of the infrastructure associated with renewable energy technology, as well as occasionally subject to standalone development proposals. This has been recognised within the position statement.</p> <p>277. Greenhouse gas removal opportunities are not within the scope of the position statement.</p> <p>278, 279. Noted.</p> <p>280. Energy efficiency of new buildings is one of the subjects of the sustainability checklist element of the position statement. The insulation of existing homes does not generally require planning permission and therefore is not within the scope of the position statement.</p> <p>281. Offshore wind energy is outside the scope of the position statement. Should any application come forward for associated infrastructure to enable such a proposal, this would be determined on its own merits on a case by case basis. Household solar and wind turbines may fall within permitted development regulations. Where they don't, the interim guidance and position statement as a whole will apply in relation to the weight given to climate change as a material consideration.</p> <p>282. Applications for localised energy generation would fall within the scope of the position statement where it is considered to be a larger scale standalone renewable energy scheme. Reference to localised energy generation will be added to the document to make this clear.</p>

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<p><u>Businesses</u> 284. Strongly support any new initiative that involved offshore wind power or tidal power, subject to review by heritage and natural history bodies.</p> <p><u>Dorset Council Cllrs</u> 285. 3.1.1 - A policy statement welcoming solar arrays, battery farms and wind turbines should be high priority.</p>	<p>283. Noted. However, to achieve maximum effect the position statement focusses on those technologies that are currently prevalent in the planning system in the council area. The position statement can be updated in the future according to any changes.</p> <p>284. Offshore wind and tidal power proposals are outside of the scope of the position statement. Should any application come forward for associated infrastructure to enable such a proposal, this would be determined on its own merits on a case by case basis.</p> <p>285. The council aims to introduce new planning policies regarding renewable energy development through the Dorset Council Local Plan. Currently the timescales and existing policy context means setting policies now isn't currently possible. Battery storage is widely considered to be part of the infrastructure associated with renewable energy technology, as well as occasionally subject to standalone development proposals. This has been recognised within the position statement.</p>
<i>Local and community energy schemes</i>	
<p><u>Local environmental organisations</u> 286. The opportunity should be taken to promote community energy schemes, especially in villages and small towns. 287. Joint schemes between existing residents and developers should establish local renewable energy production and storage facilities, and schemes where developers contribute through projects for help to tackle energy poverty, (e.g. subsidising energy conservation and damp alleviation work for the most disadvantaged residents). 288. Concern that currently it is not possible to sell energy directly to customers (except for a small loophole exploited by Dorset Community Energy).</p> <p><u>Parish and Town Councils</u> 289. Para 3.2.10 - The benefit of generation of energy local to its use should be encouraged due to the reduced need to reinforce higher voltage grid elements. 290. The statement fails to address Community Energy schemes with solar, PV or biomass infrastructure located in spaces around and near to urban areas , providing energy directly to those communities. 291. Some of the community energy delivery models obviate the need for costly and sometimes difficult grid infrastructure. In such circumstances, the need for power should be given higher priority than agricultural land use.</p>	<p>286, 287, 288, 289, 290, 291. The benefits of any community energy schemes will be considered as part of the planning application process. Where such schemes are standalone proposals the position statement will be relevant to their consideration.</p>
Position Statement 2 – Renewable energy	
<i>Point 1 – the weight to be given to the Dorset Council Natural Environment, Climate and Ecology Strategy</i>	
<p><u>Public response</u> 292. 'Given weight' is not good enough. It must be a prime consideration.</p> <p><u>Parish and Town Councils</u> 293. Implies on the one hand that the public is made aware of the potential benefits (pecuniary as well as in terms of carbon neutrality) and secondly that there is sufficient (and equal) weight given to the views expressed by all stakeholders – including those of the local community. 294. Clarification needed on levels of weight – is weight/'considerable' weight more than 'significant' weight which is used in the Heritage and Landscape Policies? – it needs to be. 295. Points 1 and 2 - should be balanced so that they both give considerable weight as material considerations.</p>	<p>292. The Natural Environment, Climate & Ecology Strategy is not part of the statutory development plan against which planning applications must be considered. It can however be taken into consideration in the context of the weight applied to climate change as a material consideration, as it sets out the council's intentions regarding climate change.</p> <p>293. Point 2 of the position statement on renewable energy development states that the benefits of proposals should be clearly set out by applicants. Planning applications are determined on the basis of assessing material considerations, which are apportioned the appropriate amount of weight according to national and local planning policy. 294, 295. It will be for the decision maker to balance whether the benefits of a proposal outweigh the impacts, informed by national planning policy, which</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
	establishes the levels of weight to be applied to landscape and heritage issues. The Position Statement will be amended to provide consistency in that significant weight will be given to both climate change as a material consideration as well as the public benefits of renewable energy schemes , however this could still be outweighed by other considerations in the planning balance.
Point 2 – the weight to be given to public benefits of renewable energy schemes	
<p><u>Public response</u> 296. Renewable energy is best developed as part of a national strategy, rather than randomly establishing hundreds / thousands of small sites in every part of the country, sacrificing countryside in a disorganised way.</p> <p><u>Parish and Town Councils</u> 297. Clarification needed on levels of weight – is weight/‘considerable’ weight more than ‘significant’ weight which is used in the Heritage and Landscape Policies? – it needs to be. This is repeated from above, remove but will affect numbering. 298. Needs addressing Public Benefits needs to include ‘Community Benefits , such as community shareholding or community benefit funds’ which is excluded in para 3.2.11. 299. Points 1 and 2 - should be balanced so that they both give considerable weight as material considerations. Remove. 300. Point 2b – query how will this be determined?</p> <p><u>Businesses</u> 301. Seems like there is little change to the arduous nature of achieving renewable energy developments. 302. Approach will discourage schemes that could help to reduce GHGs significantly but are rendered unviable because of the costs and complication of ecology and visual/landscape mitigation.</p> <p><u>Developers/landowners/agent</u> 303. Renewable energy developments are necessary in these times of rising energy costs and need to curb climate change.</p> <p><u>Dorset Council Officers</u> 304. Point 2b is crucial - is entirely stating the obvious but the question is who determines the relative importance of benefits and impacts? 305. The impact that something has is not an objectively assessable quantity based on its dimensions - a subjective judgement that varies from person to person. 306. There is no way to please everyone in this sort of debate and no way of making a set of rules that can be applied entirely objectively.</p>	<p>296. Noted. It is outside the scope of the position statement or the planning authority to set national strategy.</p> <p>297. It will be for the decision maker to balance whether the benefits of a proposal outweigh the impacts, informed by national planning policy, which establishes the levels of weight to be applied to landscape and heritage issues. The Position Statement will be amended to provide consistency in that significant weight will be given to both climate change as a material consideration as well as the public benefits of renewable energy schemes, however this could still be outweighed by other considerations in the planning balance.</p> <p>298. Case law has established that such community benefits cannot be a material consideration.</p> <p>299. Noted. The Position Statement will be amended to provide consistency in that significant weight will be given to both climate change as a material consideration as well as the public benefits of renewable energy schemes</p> <p>300, 304. The balancing of the benefits against adverse impacts of an application is undertaken by the planning decision maker through assessment of all material considerations as part of the planning application process, informed by public and statutory consultation.</p> <p>301. Noted 302. The consideration of ecology and landscape issues takes place in accordance with adopted local and national planning policy and therefore mitigation is often a requirement to satisfy necessary policy criteria.</p> <p>303. Agreed.</p> <p>305. Noted, however it is the professional role of planning officers to undertake these judgements, informed by public and statutory consultation. as part of the planning application process. 306. Noted.</p>
Point 3 – site selection and grid capacity and connection	
<p><u>Parish and Town Councils</u> 307. If a developer’s assessment of financial viability is considered, then it is essential that there is full disclosure and understanding of connectivity - Even if they are considered to be commercially sensitive, these facts should be made available to all stakeholders – including the local community who should be consulted. 308. Very constraining – pressure needs to be applied to the Government and National Grid to upgrade the Grid to enable renewable energies.</p> <p><u>Dorset Councils Cllrs</u></p>	<p>307. Planning application documents are published as part of the planning process. The council may not publish information that is deemed commercially sensitive as this could prejudice the commercial interests of an applicant/company and could be unlawful. 308. Noted.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p>309. Should we not consider protecting places with especially good connections, such as sub-stations, from developments that might frustrate that future use?</p>	<p>309. It is not within scope of the position statement to set strategy for the location of development. This would be undertaken within a strategic planning document such as a local plan.</p>
<i>Point 5 - applications affecting the best and most versatile agricultural land</i>	
<p><u>Public response</u> 310. Need wording that more robustly protects 'best and most versatile agricultural land' on basis that presumption against the use of such land.</p> <p><u>Dorset Council Cllrs</u> 311. Does this imply that developments on the very best land might never be agreed, despite perhaps they have some other very important advantage, such as a grid connection?</p>	<p>310. The approach reflects the WMS of March 2015 and national planning guidance which requires full justification for impacts on the best and most versatile (BMV) agricultural land. Therefore, the wording is considered to be appropriately robust.</p> <p>311. Issues such as impacts on BMV agricultural land, grid connection, climate change, and all other material considerations are assessed as part of the planning balance on a case by case basis. The wording reflects the national position on this issue and therefore is considered appropriate.</p>
<i>Point 6 – applications within the AONB</i>	
<p><u>Parish and Town Councils</u> 312. Overconstraining – in the same way that Para 7 attempts to balance heritage and climate – this Paragraph need to reflect the value of the AONB much of which was established in the 1950s. 313. None of these constraints are applicable in Wool - The only constraint that would appear to be relevant to Wool relates to renewable energy development on prime agricultural land/green field sites.</p> <p><u>Businesses</u> 314. Approach doesn't seem to favour GHG reducing energy developments significantly enough to strike a balance against the influence of the AONB designation.</p> <p><u>Dorset Council Cllrs</u> 315. Point 6b – concern whether this is ever likely to be satisfied - Can you give an example of the sort of circumstances when it might? If you can't it would be more honest (but in my view wrong) not to simply ban AONB energy development.</p>	<p>312, 314. The consideration of impacts on AONB takes place in accordance with adopted local and national planning policy. 313. Noted.</p> <p>315. Planning applications are considered on a case-by-case basis and therefore it would be inappropriate to provide examples, or to completely restrict development in the AONB. Point 6b reflects the national policy position for major development within the AONB.</p>
<i>Point 7 – applications affecting heritage assets</i>	
<p><u>Historic England</u> 316. Point 7 - We welcome the inclusion of a section highlighting particular considerations relating to designated heritage assets, in Part 7 of the Position Statement and from paragraph 3.2.14 of the supporting text.</p> <p><u>Public response</u> 317. There is over emphasis on harm to the heritage assets.</p> <p><u>Parish and Town Councils</u> 318. Seeks to encourage a balanced view. Could this be made clearer with some examples? 319. None of these constraints are applicable in Wool - The only constraint that would appear to be relevant to Wool relates to renewable energy development on prime agricultural land/green field sites.</p>	<p>316. Noted.</p> <p>317. The approach is consistent with national planning policy on the consideration of harm to heritage assets.</p> <p>318. Noted. Planning applications are considered on a case-by-case basis and therefore it would be inappropriate to provide examples as these could be leading/misconstrued. 319. Noted.</p>
<i>Point 8 – wind energy development</i>	
<p><u>Public response</u> 320. Wind energy should be considered acceptable from a planning perspective subject to a viability assessment. Priority should be given to smaller community based schemes.</p> <p><u>Local environmental organisations</u></p>	<p>320, 321, 322, 324. The approach taken regarding large scale wind energy development reflects the national position. As no suitable areas for such development have been identified in any of the adopted local plans or supplementary planning documents it is not possible to set an alternative approach within the position statement. Should national legislation change the guidance will be updated accordingly.</p>

Issue raised or section/paragraph of the Interim Guidance and Position Statement	Planning Policy team comments
<p>321. The politics are gradually changing in favour of more onshore wind power which is not surprising as it is one of the cheapest forms of energy and, unlike most other forms of renewable energy, can be scaled up and built very quickly - it seems perverse that Dorset Council should try to make a unilateral declaration against large scale wind developments.</p> <p><u>Parish and Town Councils</u></p> <p>322. Point 8 and footnote 37 – suggestion that approach is too complacent. Need to assume that the emergency will require much more wind investment, and faster.</p> <p>323. Off shore wind is a possibility and should not be ignored.</p> <p>324. Concern that Point 8 and Footnote 37 effectively define onshore wind as out of scope pending central government legislative change.</p>	<p>320. Smaller community based schemes may come forward and would be subject to case-by-case assessment.</p>
Other issues	
<i>Flood risk</i>	
<p><u>Environment Agency</u></p> <p>325. The guidance and checklist reference the appropriate sections on flood risk as set out in National Planning Policy.</p> <p>326. When referring to flood risk, the guidance should also acknowledge the impact of coastal change. This would be through Coastal Change Management areas which are on the former Purbeck and West Dorset coasts. The National Coastal Erosion Risk Map (NCERM) shows coastal erosion rates for the short, medium and long term and your guidance should consider the relevant Shoreline Management Plan.</p> <p>327. Under sustainable design and construction reference, the EA recommend reference is made to flood risk. the National Flood and Coastal Erosion Risk Management Strategy for England - GOV.UK (www.gov.uk) highlights the need for properties at flood risk to be resilient and 'build back better'.</p>	<p>325. Noted</p> <p>326. Noted. The council is unable to define CCMA's within the position statement as this would need to be undertaken through the production of a development plan document and appropriate public examination. The council intends to do this as part of the Dorset Council Local Plan.</p> <p>327. The checklist contains a question regarding adaptation measures in relation to climate change, which is related to flood risk amongst other issues.</p>
<i>Smaller scale renewable energy</i>	
<p><u>Parish and Town Councils</u></p> <p>328. Reference to high numbers of listed buildings in Weymouth and on the seafront and potential to fit them with solar panels.</p>	<p>328. Noted. The provision of smaller scale, rooftop solar technology is generally outside of the scope of the position statement, as in many cases this would be subject to permitted development. Where a proposal requires planning permission, the position statement will apply in the context of the weight to be given to climate change as a material consideration.</p>
<i>Minerals planning</i>	
<p><u>Businesses</u></p> <p>329. The climate emergency is not well represented as a consideration in mineral planning applications.</p> <p>330. Transporting of minerals is costly in monetary and carbon terms.</p> <p>331. Sensitive quarry development and location in areas local to their market will naturally minimise GHG emissions – should be factored into considerations.</p>	<p>329. Mineral planning is covered by the Minerals Strategy (2014) which includes a policy requiring the preparation of a climate change assessment for minerals applications (Policy CC1).</p> <p>330. Noted.</p> <p>331. Noted. The Sustainability Checklist includes a section regarding the use of locally sourced materials and minimising carbon emissions associated with their production and transport.</p>
<i>Inclusion of transport matters in the position statement</i>	
<p><u>National Highways</u></p> <p>332. For renewable energy developments that are in proximity to the Strategic Road Network, National Highways require consideration and resolution of matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic). Renewable energy and sustainability measures cannot compromise the safe and efficient operation of the SRN.</p> <p>333. It should be noted that DfT Circular 01/2022 sets out how National Highways engage with the planning system and how, in the context of the strategic road network, sustainable development should be achieved through planning. It recognises that where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. The Circular states that local planning and highway authorities need to move away from transport planning based on predicting future demand to</p>	<p>332. Noted. Highway safety and capacity issues would be considered as part of the planning application process.</p> <p>333. Noted. Such an approach will come forward through the production of the new Local Transport Plan in combination with the Dorset Council Local Plan.</p> <p>334. Noted.</p> <p>335, 336, 337. The spatial strategies and settlement hierarchies of the existing adopted local plans provide firm local planning policy for the appropriate siting of development, which is a primary consideration. The position statement therefore does not address this issue as it is well covered. The emerging local plan and local</p>

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<p>provide capacity, to planning that sets out the outcomes communities want to achieve and provides the transport solutions to deliver these outcomes (a vision-led approach).</p> <p><u>CPRE</u></p> <p>334. Not covered by existing policies since the current Transport Plan (LTP3) came to an end in 2020 and there is not timetable for LTP4. LTP4 should be issued as soon as possible.</p> <p>335. There is little evidence that a shift towards active travel and siting developments in sustainable locations is occurring. Transport issues appear to carry little weight in decisions and large developments continue to be built on the edge of towns.</p> <p><u>CCAONB</u></p> <p>336. Lack of sustainable transport in a rural county – means even the larger settlements aren't really sustainable. Need for personal transport needs to be acknowledged.</p> <p><u>Public response</u></p> <p>337. Transport and infrastructure discussion must be a compulsory part of the planning process which should seek infrastructure gain and safe, sustainable, low carbon transport routes for new developments.</p>	<p>transport plan will provide updates to strategic policies in relation to sustainable location of development and transport. A section will be added to the checklist relating to sustainable travel, and this will be reflected in the position statement.</p>
<p><i>Inclusion of biodiversity matters within the position statement</i></p>	
<p><u>Environment Agency</u></p> <p>338. Biodiversity net gain, habitat creation and restoration brings opportunities to help sequester carbon as well as help combat climate change effects such as urban heat and build resilience. The drivers for these opportunities is therefore different to solely providing biodiversity net gain. The retention of existing features such as hedgerows can also provide immediate green infrastructure for new developments. EA recommend that this is considered in some level within this guidance.</p> <p><u>CPRE</u></p> <p>339. Note that from November 2023 most permissions will need to deliver at least 10% biodiversity net gain and the applications must be supported by ecological information.</p> <p><u>Public response</u></p> <p>340. Planning rules in Dorset must compel developers to work with nature and not against it - prevent the destruction of trees, landscapes and environments and encourage ecological gain.</p>	<p>338, 339, 340. This is noted however the council has now produced guidance relating to the issue of biodiversity net gain, which it is considered covers issues of habitat creation, hedgerow retention etc. Reference to this guidance will be added to the position statement.</p>