

Portland Neighbourhood Plan - Submission Plan Representation Summary

Portland Town Council submitted the final version of the Portland Neighbourhood Plan (2019) representing the parish of Portland to Dorset Council for independent examination in July 2019.

People were given eight weeks from Thursday 15 August 2019 until the end of Wednesday 9 October 2019 to comment on the content of the plan or how it was produced. At the close of the public consultation 22 representations were received. A further two representations were received late and two representations submitted by Portland Sculpture & Quarry Trust and V Pomeroy were updated after the close of the consultation. Late representations and amended text are shown as **highlighted text**.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original, full representations as they were submitted to Dorset Council are available online from:

www.dorsetcouncil.gov.uk/portland-neighbourhood-plan

| Rep ID | Respondent | Summary |
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| 1 | Sport England | Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Standard response to Neighbourhood Plans attached. No specific comments provided on the Portland Neighbourhood Plan. |
| 2 | Highways England | <p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the A35 with which the A354 (the principle route into Portland) connects at the Stadium Roundabout, Dorchester.</p> <p>Policies which seek to improve the provision of local employment opportunities, and retain and enhance community services and facilities are welcomed. Policies which support improvements to public transport, footpaths and cycleways are also supported. These policies should help improve long term sustainability and reduce the need for out-commuting and private car trips.</p> <p>Policy PORT/ST1 in relation to sustainable tourism development and references to “Portland Eden” are noted. Any large scale development proposals that come forward which have the potential to impact on the operation of the SRN, in particular at Stadium Roundabout which experiences congestion at peak times, will need to be supported by a suitable transport assessment and mitigation measures in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development.</p> |

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| 3 | Paula Klaentschi | <p>Given the Climate Emergency I find the document very light on how renewable energy projects will be supported. Surely Wind Turbines should be planned?</p> <p>Also the issue of flooding is identified but not increased storm wind speeds. Buildings and structures need to plan for increased wind loads into the future.</p> |
| 4 | National Grid | <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. No record of such apparatus has been identified in the Neighbourhood Plan Area.</p> <p>The electricity distribution operator in Dorset Council is Scottish and Southern Electricity Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>A map of the National Grid network across the UK is supplied.</p> |
| 5 | The Jurassic Coast Trust | <p>Paragraph 2.1 – ‘Jurassic World Heritage Coast’ is an incorrect term. The official name for the World Heritage Site is the Dorset and East Devon Coast World Heritage Site. The term ‘Jurassic Coast’ is a brand. References to the World Heritage Site throughout should be adjusted. I recommend following the convention that we use; in the first instance refer to the Site as ‘...the Dorset and East Devon Coast World Heritage Site, also known as the Jurassic Coast...’. After that the World Heritage Site can be referred to as simply the Jurassic Coast or the World Heritage Site, or indeed the Jurassic Coast World Heritage Site. Abbreviations to WHS or JCWHS are also acceptable.</p> <p>Paragraph 2.2 – As above, the term ‘Jurassic coastline’ is incorrect. Please use ‘Jurassic Coast’ or ‘Jurassic Coast World Heritage Site’. Also see para 7.3</p> <p>Paragraph 2.6 – Considering that the plan recognises that the natural environment and heritage assets on the Island are of great value to the community of the Island and beyond, it is a shame that they are initially introduced as ‘significant physical challenges’.</p> <p>Policy No. Port/EN4 Local Heritage Assets – within NPPF, World Heritage Sites are classed as designated heritage assets. I would suggest adding a brief paragraph here regarding the Jurassic Coast World Heritage Site, explaining that it is a heritage asset of global significance and protected via international convention. Also, it is important to explain that its heritage value lies in its natural attributes, namely geology, palaeontology and geomorphology. Usefully, the boundaries of the WHS are already indicated on map 4, so this can readily be referred to as part of this brief description.</p> <p>Paragraph 7.46, Port/EN5 Historic Piers – this applies in similar ways to the WHS, which is itself a designated heritage asset for its natural qualities. Any future redevelopment of the historic piers should avoid damaging the outstanding universal</p> |

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| | | <p>value of the WHS (for details, see the current WHS management plan https://jurassiccoast.org/world-heritage-site-partnership-plan). Any projects brought forward under the policy should be subject to early consultation with Natural England and the Jurassic Coast Trust. This should be referenced within the neighbourhood plan.</p> <p>Paragraph 8.24 – the Northern Arc also incorporates part of the World Heritage Site.</p> <p>Paragraph 8.25 – could equally apply to the World Heritage Site</p> <p>Policy No. Port/HS2 Community Housing Assets – specifically in regards to point iii b “the site is not a statutory or non-statutory designated area of ecological or geological value”. Considering that the entire island of Portland is a Local Geological Site (a non-statutory designation). This may need some careful re-wording to make sure the policy is not unreasonably undermined. Suggest consulting the Dorset Important Geological Sites group as soon as possible. They are the group responsible for Local Geological Sites.</p> <p>Policy No. Port/ST2 Beach Huts – specifically in regards to “vi. avoid any significant negative impact on the biodiversity, landscape and setting of the site and the surrounding area”. Whilst the policy encourages sensitivity to biodiversity and landscape in the areas of the beach huts, it is worth noting that the area indicated on map 15 largely rests on a SSSI with geological interests. Specifically, the interest relates to the preserved raised beach that exists just below the surface. This feature is also included in the World Heritage Site. In the past, various works associated with the beach huts have had to avoid negatively impacting the raised beach feature. We and Natural England would expect that practice to continue into the future. We recommend the wording in this policy is amended slightly to make sure reference to geological / earth science / geodiversity interests is included (any one of these three terms will do).</p> <p>Policy No. Port/ST3 Tourist Trails – as above, recommend a slight amendment to include reference to the need to avoid negative impacts to geodiversity.</p> |
| 6 | Peter Siddons | <p>The plan mentions the old railway line on Portland. There is a very important part of the railway line left at the end of Park Road. It is a haven for wildlife. There are many visitors to the railway cutting to enjoy the wildlife. At present there is a claim for a right of way on the old railway cutting which can be confirmed by the definitive map department at DCC. I believe when the houses are built by the railway cutting the owners are going to make the cutting a wildlife reserve.</p> <p>Could someone look at two videos made by Mr Ken Dolbear MBE called The accelerating Decline of the Flora and Fauna of Portland Part one and two. Ken has photographed and recorded many rare species of plants and wildlife on Portland, and many of his photos have been published in books and finds recorded with the natural history museum.</p> |

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| | | Portland is unique with its beautiful scenery and wildlife it attracts many visitors to participate in walking, rock climbing, wildlife and much more. The island has many foot paths, linking up villages and enabling people to get around and the footpaths must be maintained and preserved. At present some of the footpaths are overgrown and in a poor state of repair. |
| 7 | Weymouth Civic Society | <p>We would like to reiterate our agreement, set out in our letter of 15th August 2018, with the thoughtful attitude towards the development of Portland displayed in the Plan, and the imaginative proposals included in the document.</p> <p>In particular, we welcome the demands for the provision of adequate parking in new developments and the need to safeguard existing public car parking areas.</p> <p>We share the concerns highlighted in the Plan and support the policies designed to protect the unique qualities of Portland, including its rich heritage of historic buildings and the landscape character of the island.</p> |
| 8 | Wessex Water | <p>Policy No. Port/EN3 The Portland Quarries Nature Park - Wessex Water has an existing reservoir within the Quarry Nature Park Aspirational Area 1. The site is Yeates Reservoir No 2 (Site ID 11362, Grid Ref 368920,072978). As the stated purpose of the policy is to remediate redundant quarry sites the boundaries should be amended to remove the reservoir which is an operational water site from the proposed nature park area.</p> <p>Policy No. Port/EN7 Design and Character - We are concerned that Policy EN7 Design and Character may be overly restrictive when we are seeking consent to undertake maintenance/improvement works to our existing infrastructure. In response to development requirements, we may also need to construct new above ground infrastructure during the plan period. The requirements under Policy EN7 Design and Character should incorporate greater flexibility to recognise that infrastructure development and maintenance by utility companies by its nature needs to be functional and considerations such as security and health and safety must take precedence over appearance. While we seek to ensure design is sensitive to its location as possible, there are often constraints on location (due to existing below ground infrastructure), materials (for example requirements to meet national security standards) and size/form (driven by operational requirements).</p> <p>Policy No. Port/EN8 The Verne - Policy No. Port/EN8 The Verne identifies support for the possible re-use of the Verne for key worker housing, live/work units or enterprise/tourism schemes. There is no public water supply to the Verne Site and this area has been served by private arrangements. If the developer wishes to connect to the public water supply a booster station will be required, the costs of building this will need to be factored in by the developer.</p> |
| 9 | Tony Walter | <p>Dorset Council and Portland Town Council declared climate emergencies in summer 2019. Would it therefore be possible to add an extra bullet point to para 14.2 of the Neighbourhood Plan, as follows:</p> <ul style="list-style-type: none"> • contribution to reducing Portland’s carbon footprint. |

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| 10 | Giovanna Lewis | <p>Section 13: Sustainable Tourism. Car journeys to Portland Bill and the cruise shipping industry – two of Portland’s most popular tourism activities in terms of tourist numbers – have high carbon footprints and contribute to health-damaging pollution. In supporting the expansion of sustainable tourism (6.3, 13.1, 13.7), Section 13 of the plan should state that this means tourism expansion that reduces - rather than increases - pollution and the island’s carbon footprint. This requires, for example, public transport to Portland Bill throughout the year, and clear signposting of the walking paths to the Bill from bus no.1’s Southwell bus-stop. The environmental and climate impact of cruise ships should be monitored.</p> |
| 11 | Weymouth & Portland Access Group | <p>With respect to the present consultation we wish to record our support for the Submission Document.</p> <p>We support Policy HS1 Housing Design (but suggest that para 9.11 should be added to, to recognise the benefits of accessible and adaptable housing. This would be compatible with Policy ENV12(ii) of the West Dorset, Weymouth and Portland Local Plan and the recent Government Planning Policy Guidance “Housing for Elderly and Disabled People”. If the housebuilding industry geared itself to adopt specifications which improve accessibility and adaptability it should cost little if any more than existing housebuilding but would save substantially on the considerable public and private funds spent when homes need to be adapted for occupancy by a disabled person. Also important is the concept of “visitability”, enabling people with disabilities to visit friends and family. The 2017 Government White Paper “Fixing our broken housing market” refers to the need for more understanding of the demand for accessible housing, and the Neighbourhood Planning Act, 2017, requires local authorities to address housing needs that result from old age or disability.</p> <p>The Access Group also supports policies;</p> <ul style="list-style-type: none"> • TR1 Improved Transport Links • TR4 Infrastructure Links • SS1 Reinforce Local and Neighbourhood Centres • CR1 Protection of Recreational Spaces • CR2 Local Green Spaces • CR3 Allotments • CR4 Sites of Open Space Value • CR5 New Community Facilities • CR6 Community and Visitor Events • ST3 Tourist Trails <p>Policy EN2 is also supported. The extension of the Portland Quarries Park would be greatly beneficial in terms of human health and wellbeing as well as in terms of biodiversity. Whilst there will clearly be accessibility limitations many people with</p> |

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| | | <p>disabilities will appreciate the PQNP for its peace, good air quality, and its natural attributes. With regard to the difficulties in terms of mobility it is hoped that it may prove possible to reintroduce some form of all terrain wheelchairs which would be able to follow some of the routes.</p> |
| 12 | Portland Town Council Climate and Ecological Emergency Working Group | <p>The Portland Neighbourhood Plan is the result of seven years of work, research, and extensive consultation with Portlanders. In May and June 2019, the UK government, Dorset Council and Portland Town Council all declared a climate emergency (in Portland’s case, a climate and ecological emergency). These declarations highlight the urgency of action to tackle global warming which – though already reflected to some extent in the neighbourhood plan – is rapidly rising as a public concern. Public understanding of sustainable development - how development can affect the planet’s capacity to sustain human existence - is changing fast.</p> <p>In light of this, the Working Group on the Climate and Ecological Emergency set up by Portland Town Council recommends that the neighbourhood plan proceed to referendum, but that it be revisited and reviewed at the earliest opportunity. The review should take account of:</p> <ul style="list-style-type: none"> • the increasing public concern about climate change • the revised Strategic Local Plan, and any new local plan produced by Dorset Council • (hopefully) a National Planning Policy Framework and Building Standards strengthened to ensure that the UK can move as rapidly as possible to carbon neutral • any other steers from national and local government in relation to carbon emissions <p>As it stands, Portland’s neighbourhood plan is strong on the need to protect biodiversity, along with its ambition for Portland to become a centre for renewable energy generation. Reflecting national policy and the local plan, however, our neighbourhood plan is far from strong enough to eliminate carbon emissions from transport and from new housing on Portland. The longer UK government policy ties our hands in this respect, the more we are literally building global warming into Portland.</p> <p>This ambition for an early review of the plan in light of the urgent need to move to net zero carbon emissions could be expressed in an additional para 14.5</p> |
| 13 | Historic England | <p>There are no issues associated with the Plan upon which we wish to comment.</p> |

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| 14 | The Theatres Trust | <p>Within the area of the plan is the Royal Manor Theatre. The Royal Manor is a valued community and cultural facility serving the local area, providing opportunities for engagement and participation in the arts as well as a space for events and meetings. This can help bring people together and improve well-being. In particular it offers programmes for young people which is a particular focus of the plan.</p> <p>Although the plan is supportive of new community facilities, it makes no reference to the theatre as a valued facility at any point. Neither does it seek the retention and protection of any other community facility other than those referenced for sport and recreation within Policy No. Port/CR1. We would suggest the plan should be amended to either broaden Policy No. Port/CR1 to include a wider range of facilities which can include the theatre, or for Policy No. Port/CR5 to include additional text protecting existing facilities.</p> |
| 15 | Dorset Wildlife Trust | <p>The PQNP map as illustrated on ‘Map 7. Quarries Nature Park, Portland’ is incorrect as it does not recognise the full extent of the current PQNP area within Tout Quarry. Map 7. currently indicates an area of the south west corner as aspirational PQNP, but should include the full extent of Dorset Wildlife Trust’s Tout Quarry lease area (as indicated on the map supplied).</p> <p>The area of Tout Quarry currently mapped as ‘PQNP Aspirational area’ on ‘Map 7.’ is a well-established part of the PQNP having been leased by Dorset Wildlife Trust since 2012 and open to the public and managed by the Portland Sculpture & Quarries Trust since 1983.</p> <p>Weymouth & Portland Borough Council acknowledged the PQNP as an ‘exemplar project’ of which the entirety of Tout Quarry plays a pivotal role. Use of former quarry environment within the PQNP area has diversified visitor interest on the Island, provided activity for longer visitor stay, and has made a long term contribution to the local economy through sustainable tourism and educational initiatives.</p> |
| 16 | Pete Roper | <p>In light of Dorset Council’s and Portland Town Council’s declarations of climate emergency, and the urgency of reducing carbon emissions as from now, it is vital that the new housing Portland needs does not add to emissions. I would very much like to see page 50 of the Neighbourhood Plan add a new section after HS4 as follows:</p> <p>Policy No. Port/HS5. New housing to be carbon neutral.</p> <p>Portland should contribute to radical reductions in greenhouse emissions (NPPF 2019, para 148; Local Plan 2015, 2.6.9-15; Local Plan review preferred options 2018, 2.7.14-20). New housing should therefore be as near carbon neutral as possible.</p> <p>9.27 New developments should be as well insulated as possible, so that dwellings can be heated affordably by electricity - which is much easier than gas to generate with minimal carbon emissions. Sustainable development’s requirement to meet the needs of the present without compromising the ability of future generations to meet their needs means that houses</p> |

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| | | <p>should not be installed with conventional gas central heating which future generations (and quite possibly the current generation) will have to de-commission at considerable expense.</p> <p>9.28 Solar panels should be fitted as standard, and biofuel and ground source heating encouraged in planning applications.</p> <p>9.27 In order to reduce Portlanders’ use of the car, new developments should be not only on brownfield sites within the island’s main settlements, but also within easy walking distance of existing bus routes and local services, subject to constraints.</p> <p>All these requirements conform with NPPF 2019, para 153, and the Local Plan (ref as above).</p> <p>Section 9 Housing to add: Each new dwelling with a dedicated parking place to include an electric car charging point. Developments with communal parking to include communal charging points. Shopping and industrial developments to include charging points.</p> |
| 17 | Portland Port | <p>We are an operator of a deep water commercial port and a statutory harbour authority. We are responsible for a large area of water space inside and outside the breakwaters and own a large area of land on Portland and the breakwaters. We are the only deep water port in Dorset and regionally between Falmouth and Southampton. The land estate on Portland includes areas that are designated as key employment land, and land with potential to develop in the future. We are also responsible for other land of community and environmental value for reasons that include nature conservation, heritage and coastal access. Of specific relevance to the Key Employment Site we can provide evidence to demonstrate that in the next 5 years we predict to cargo throughput to increase to in excess of 1 million tonnes, and in doing so we would qualify for major port status. This would not be possible without the support from local government and the community and we recognise the importance and value of those relationships. The Neighbourhood Plan is a key document that we recognise will help us deliver upon this opportunity and with this in mind we seek changes which we genuinely believe will benefit Portland as a whole. The significance and value for the Portland community is linked to employment, energy security, environment, prosperity and connectivity as a few examples.</p> <p>Our requested changes which I emphasise in the context of the above statement. These are listed as follows and build upon what we have said in previous consultations:</p> <ol style="list-style-type: none"> 1. Policy Env2 relating to European Sites and other references - The current wording states that “<i>all internationally designated wildlife sites, will be safeguarded from development that could adversely affect them.....</i>” whereas in the regulations this instead refers to ‘significant effect’. We think it is important the the terminology is the same as what is used in the Regulations. This is important when undertaking Habitat Regulation Assessments for any proposal whether on or nearby to a site of this kind. 2. Policy EN2 (Energy) - Portland has an opportunity and a desire to become to lead the way in energy development and self sufficient. It is currently somewhat challenged by poor connectivity to the mainland Chickerell substation with |

solutions relying on significant external public or private investment. We are supportive of this policy but ask that the policy title is amended to read “Renewable and **Cleantech** Energy Development” as we believe this is what is required on Portland and what was meant when creating this policy noting that in the text it refers to low carbon development.

3. **EN6 (Defined Development Boundaries) and Map 8 and 8A, BE1 (Employment Sites) and Map 10 and 10b, and BE6 (Northern Arc) and Map 11** - the port is recognised in the Local Plan as a Key Employment Site comprising a number of sub-sites all of which are bound by a defined development boundary. For reasons that are unclear the defined development boundary has been removed from some of the Key Employment Site which leads to an inconsistency between the Local and Neighbourhood Plan. Rather than treating the port as one entity for which it is, the Neighbourhood Plan implies a difference within which is not the case. To explain, the port is one site or entity with all development land within inter-connected by a road network to the port piers, berths and jetties. There is one security controlled entrance in Castletown that links to the external road network. We also have a port police force responsible for the area in its entirety. In an already highly complex regulatory regime we seek simplification which is essential if we are to effectively manage existing activity and deliver growth in the long term. We therefore request that the defined development boundaries are reinstated for the key employment site in its entirety to ensure that this inconsistency does not lead to unintended consequences to the detriment of the key employment site, and the new proposed Northern Arc area. The land numbered in the Neighbourhood Plan as Port 1-7 should all be allocated as Key Employment Site with a defined development boundary. Port 7 should also be extended to include the Parade Ground for accuracy.
4. **Chapter 10. Transport** - this goes some way to identify the need for improvements to transport infrastructure however noting the port is on the journey to major port status a clear message in the plan is required that designates the route to the port in such a way that recognises this importance, protecting access and egress and identify this as a route where infrastructure improvements are required to facilitate this real opportunity. You only have to look at Map 2 of the Plan which shows the ‘A’ Roads, but not the route to Portland Port. We do believe that the transport ‘Aim’ and underlying objectives should go further if the business and employment potential on the island is to be realised.
5. **Map 16 Portland Tourist Trails including Heritage Paths** - the key should distinguish between what is existing and what is an aspiration.
6. **Policy ST4 Marine Berths for Tourists** - the purpose of this policy is unclear noting the particular focus on tourists. The Port in the last 10 years has invested in excess of £10 million pounds on berth improvements and this investment continues. The purpose being to attract all types of shipping not just related to tourism. It can not justify berth improvements based on tourism alone. Our suggestion is therefore either that the policy is deleted as it is already covered by BE6 in there being a policy for the Northern Arc or the policy should recognise the need for multi-functional berths for all vessel types as this is what will underpin the financial case for their delivery.
7. **Map 2 Heritage Character Areas** - we continue to express our concerns that the port has been divided into 2 character areas. Point 3. Above is relevant.

At this point in time our concern is such that we could not support the Plan in its current form.

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| <p>18</p> | <p>Homes England</p> | <p>Homes England has a land interest at the former Royal Manor School in Easton, Portland (“the Site”). The school was closed in 2016 following the consolidation of schools and their associated facilities across the Isle to the new Atlantic Academy in Southwell (less than 1.5 miles from the Site). Homes England is committed to delivering high quality homes – including an element of affordable housing – at the Site to help respond to local housing need and is preparing to submit an outline planning application shortly.</p> <p>The whole site is included within the plan’s evidence base (Portland Site Appraisal Report, 2017) which is used as the basis to conclude that Portland can satisfy its own housing need by locating new housing within Portland’s Defined Development Boundaries (DDBs) (paragraph 9.7 of the submitted Neighbourhood Plan).</p> <p>The National Planning Policy Framework (2019) (“NPPF”) establishes the importance of plans properly addressing identified housing needs, including affordable housing, in paragraph 15 and section 5. In terms of this neighbourhood plan, the most relevant policies for assessing the approach to housing need are Port/EN6, which identifies the location of future housing growth on Portland, and Policy Port/HS2 which provides the criteria for exceptional circumstances for the development of affordable homes outside of DDBs.</p> <p>Policy Port/EN6 – Defined Development Boundaries</p> <p>Homes England considers that the policy approach to delivering housing in the submission version of the Neighbourhood Plan (Port/EN6) requires minor amendment in order to have proper regard to the NPPF and achieve general conformity with strategic policy Sus5 of the current adopted Local Plan.</p> <p>Homes England agrees that the general approach of limiting development within DDBs has the potential to provide dual benefits which do accord to the national policy of the NPPF, namely:</p> <ul style="list-style-type: none"> (a) Making an effective use of land by promoting development on previously developed land (paragraphs 117 and 118(c)). (b) Encouraging development in locations which have access to existing accessible community infrastructure and services where capacity exists (92(e),110 and 122(c)). <p>Homes England also acknowledges that, due to the development constraints on the Isle, this continued strategy is logical and is in accordance with the relevant adopted strategic policy (Sus 2) in the current Local Plan. However, it is suggested that Port/EN6 should also have regard to paragraph 123 of the NPPF which seeks to further maximise the effective use of land where there is an identified shortfall of developable land. This could be done by setting a minimum density on the condition of not undermining design quality (as supported by Policy Port/EN7) or otherwise through the support of proposals which can demonstrate such an effective use of land.</p> <p>Policy Port/HS2 – Community Housing Assets</p> |
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Homes England supports the inclusion of an affordable housing exception policy in the neighbourhood plan, however, the approach taken in Policy Port/HS2 is too restrictive to be considered to have appropriate regard to the NPPF. The effect of clauses G and H may lead to undue restriction on exception sites being delivered where community led projects are not forthcoming. It is worth noting that national funding for affordable housing may require occupiers to have rights to acquire a share in a home or the “right to acquire”. The proposed restrictions may act to remove funding opportunities to support affordable home ownership (e.g. ‘shared ownership’), which, without these restrictions, would be available only to local people in need. This effect is potentially exacerbated by the dependency of development on previously developed land within DDBs and fails to conform with the intended outcomes of strategic policy Hous2 of the currently adopted local plan.

Focusing development within DDBs (see sites Portland Site Appraisal Report, 201711) may have the unintentional effect of the under delivery of affordable housing on the Isle. Development on previously developed land will not traditionally deliver local plan target levels of affordable housing. This is due to higher abnormal costs associated with development and the eligibility of some sites for Vacant Building Credit. In these instances, the amount of affordable housing liable to be delivered at a site can be reduced, and in some instances, nullified.

The most publicly up to date evidence in the 2017-2018 Housing Monitoring Report states that only 13% of new homes delivered across Weymouth and Portland were affordable against the target in Portland of 25%. Average house prices have also increased against average earnings across Weymouth and Portland year on year since before the adoption of the current Local Plan with the average median house price now 8.7 times the average level of earnings within the region². This negative trend could be seen as an indicator of the challenge of a “brownfield first” approach for delivering new homes and demonstrates the need for an inclusive affordable homes exceptions policy.

Whilst Homes England supports self-build community led projects, clauses G and H of Policy Port/HS2 could potentially dissuade or exclude others (including registered providers of social housing) from having involvement within the development and management of entry level exception sites and reduce the potential for new affordable homes on the Isle. Therefore, the policy does not provide the intended support for affordable exception sites promoted in paragraphs 71 and 77 of the NPPF.

It is suggested that clauses G and H should not be included within Policy Port/HS2. The policy would then be considered to be have proper regard to paragraphs 71 and 77 of the NPPF and comply with strategic policies Hous2 and Sus2(iii) of the adopted Local Plan.

The promotion of community led self-build projects can then be dealt with under a separate policy without unduly restricting entry level exception sites.

Policy Port/CR1 – Protecting Recreation Spaces

The National Planning Policy Framework considers the protection of open space within paragraphs 96-99. Policy Port/CR1 of the submission version of the neighbourhood plan addresses the protection of recreational space. However, we note that a number of sports/recreation facilities on the Isle are not listed in Policy Port/CR1 or noted on Map 13. This includes the Southwell Green playing field (and LEAP), Victoria Gardens Tennis Courts and Bowling Green, and Grove Bowling Green.

Homes England supports the general principle of the policy but suggests that the facilities at the former Royal Manor School should be excluded from the list of sites included for specific protection within the policy wording of Port/CR1. This change should be made for the following reasons:

- (a) The Site is already included within the strategy to fulfil housing need on the Isle within DDBs, and so it is confusing that the site is also protected for recreational use.
- (b) The recreational facilities at the Site were associated with the previous use of the site and have already been replaced with higher quality facilities at the new Atlantic Academy.
- (c) The Site is private land and therefore should not be considered public open space; however, it is in close proximity to existing public open space facilities (Weston Playing Fields and MUGA) and will provide new linkages to these spaces through the Site.
- (d) The development of the site will provide new public open space in accordance with the adopted local plan and national Fields in Trust guidance.
- (e) The potential CIL receipt generated through the development of the Site (see para 2.4.10) could support the provision of additional facilities on publicly owned land adjacent to the site in accordance with Sports England Pricing Guidance (2018).

Fulfilling Housing Need

Paragraph 9.7 of the submitted neighbourhood plan discusses DDBs and states that an evidence exercise was undertaken to establish the availability of land to provide a continued supply of new dwellings on the Isle. The paragraph continues to state that “the study shows that, with the phased release of redundant public sector land and supportive facilitating policies, there is sufficient land within or adjacent to existing built up areas to provide housing to meet local needs.” This study (Portland Site Appraisal Report, 2017) includes the Site. It is therefore unclear why a large portion of the site is also being sought to be protected under the Policy Port/CR1 as it is contrary to the plan’s housing strategy and thereby does not show proper regard to paragraphs 117 and 16(d) of the NPPF.

For the reasons outlined above, it is suggested that the reference to Royal Manor should be removed from this policy.

Replacement of Recreational Facilities

The recreational facilities at the Site were associated with its previous use as a school which was closed in 2016 when it was replaced by the new Atlantic Academy in 2016. The replacement of educational facilities at the Atlantic Academy included these recreational facilities.

In terms of the previous use of the Multi Use Games Areas (MUGAs) at the Site were limited by:

- (a) their main use as the only hard surface playgrounds for the school;
- (b) the nature of the school's private control over the facilities and their unavailability at weekends; and
- (c) poor surface quality and lack of ancillary facilities for community club use.

Whilst still controlled by the school, new sports provision at the Atlantic academy included the following improvements:

- (a) a separate playground away from new MUGA facilities;
- (b) better secured facilities available throughout weekends and public holidays;
- (c) extra provision in the form of a single purpose sports hall, dance studio, and heated swimming pool; and
- (d) new marked sports pitches across new playing field space.

We understand that the new sports provision at the Academy includes the following, which more than makes up from the facilities provided by the schools which closed including the one at the Site:

- One rugby pitch up to age of 18/ senior level
- Two football pitches up to age of 18/ senior level
- A 100m running track
- One long jump pit
- Two tennis courts
- Two netball courts
- A sports hall (597 sqm including four badminton courts/basketball court/handball pitch, markings for volleyball, trampoline with harness and two cricket nets.)

Homes England considers that the Site has already fulfilled criterion of the strategic policy COM5 and the tests laid out in paragraph 97(b) of the NPPF. The inclusion of the site within this list creates a risk of duplication of the replacement of these facilities.

It is suggested that this policy is no longer relevant to the former Royal Manor School. Notwithstanding other reasons for doing so, reference to the Site should therefore be removed from the policy.

Access to public open space

The former facilities at the Site were not open to the public, however there are two playing fields located less than 2 minutes' walk from the Site. The proposal at the Site will provide new footpaths linking to these areas and therefore increase access to public open space including a MUGA at Weston Playing Field. The new proposal will also include a new LEAP in accordance to the accessibility and size guidance of Fields in Trust.

It is noted that the proposals will also qualify for the payment of CIL. If the neighbourhood plan is made, the town council will receive 25% of the CIL payment. This CIL payment is expected to be around £615,000 in total and therefore £154,000 will be received by the town council if the neighbourhood plan is adopted. This means that, notwithstanding the above points, the town council would also be able to use the payment received to purchase an extra MUGA facility³ for the neighbouring Weston Playing Field which is currently under its control and further increase local access to local recreation facilities in Easton.

It is suggested that the inclusion of the former Royal Manor School would prevent the potential funding of new recreation facilities, contrary to the intended outcome of the policy. Notwithstanding other reasons for doing so, reference to the Site should therefore be removed from this policy.

Conclusion

Homes England recognises the important role of local communities in local decision making and is supportive of the diligent approach taken in the Neighbourhood Plan and supporting evidence documents. This considered, Homes England suggests that the following minor changes should be made to the plan:

Policy Port/EN6

Suggested Change: Include sentence promoting effective use of land

Reason for Change: Policy should have regard to paragraph 132 of the NPPF.

Policy Port/HS2

Suggested Change: Clauses G and H should be removed from the policy.

Reason for Change: Restrictive criteria should be removed to achieve the intended outcomes of paragraph 71 and 77 of the NPPF and comply with strategic policies HOUS2 and Sus2(iii) of the adopted Local Plan.

Policy Port/CR1

Suggested Change: The reference to facilities at the Royal Manor School should be removed from the policy.

Reason for Change: The reason for the inclusion of the site is unclear as recreation facilities have already been re-provided elsewhere on the Isle in accordance with COM5 of the current local plan. The site is also identified for housing within the plan's evidence base. The wording should be removed to avoid any ambiguity in regard to paragraph 16(d) of the NPPF.

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| <p>19</p> | <p>Powerfuel Portland Ltd</p> | <p>Powerfuel Portland Limited (PPL) is fully supportive of the role the emerging Portland Neighbourhood Plan will play.</p> <p>Chapter 2 '<i>Portland now</i>' highlights the economic challenges associated with the decline of traditional industries, such as quarrying, and the withdrawal of the Royal Navy in the 1980's. Notwithstanding the significant regeneration efforts made to date, the knock on social effects of these structural changes are still evident on Portland. These include social and economic deprivation, higher unemployment levels, lower levels of educational attainment and poor health levels.</p> <p>Therefore, it is critical that the plan highlights and supports all potential opportunities for future economic growth associated with Portland Port and other suitable locations. PPL believes that significant opportunities exist at Portland for new investment in the energy recovery from waste and waste to fuel sector, within the Port area. In taking advantage of these opportunities, it will be possible to create new jobs with the associated incomes benefitting the local community and promoting sustainability. PPL strongly believes that these investment opportunities should be identified in the neighbourhood plan.</p> <p>PPL generally supports the Portland Neighbourhood Plan's stated aims, and specifically the aim relating to business and employment, to strengthen the Island's business function, building growth and prosperity. PPL believes that potential investment in new infrastructure on Portland, to sustainably manage waste material and generate low carbon energy, can help to deliver the plan's strategic economic aims.</p> <p>The plan sets out a series of objectives. PPL broadly supports these objectives, particularly those in respect to the environment that identify opportunities to increase renewable and sustainable energy production, and in respect to business and employment those that protect existing employment spaces for employment use. However, PPL proposes that a further objective be added that recognises the opportunities within the Portland Port estate for economic growth.</p> <p>PPL broadly welcomes the inclusion of Policy Port/EN2 (<i>Renewable Energy Development</i>), as this supports the development of energy generating infrastructure using renewable or low carbon sources. However, it believes that the policy as drafted is too narrow, with the examples referenced being only wind and tidal power. It does not make any reference to low carbon energy generated by other technologies, such as the recovery of energy from waste materials.</p> <p>The policy as written, therefore, does not recognise the potential on Portland for the development of energy recovery technologies that can make a positive contribution towards more sustainable energy generation, particularly existing and new innovative technologies that can manage waste and produce low carbon energy, or related fuel products that can be utilised for energy production.</p> <p>PPL proposes that the words 'energy recovery from waste' and 'waste to fuel' be inserted into Policy Port/EN2 to ensure that this policy is representative of a broader range of renewable and low carbon technologies, and to confirm that proposals for low carbon will be given in principle support. It is proposed that additional text also be added to state:</p> |
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‘Proposals for energy recovery and waste to fuel infrastructure will be supported where it can be demonstrated that these are in accordance with the policies of the Development Plan.’

Similarly, supporting paragraphs 7.23 to 7.28 focus entirely on Portland as an ideal location for renewable technologies, such as geo-thermal, solar and wind, to be developed. Whilst PPL recognises that this is no doubt the case and would support such initiatives, the supporting text is unbalanced making no reference to other low carbon technologies, such as energy recovery waste, or low carbon fuel production at potential locations on Portland where this might be considered appropriate.

PPL proposes that an additional paragraph of supporting text should be inserted to highlight the potential for energy recovery and waste to fuel infrastructure on Portland. As is the case for other renewable technologies, this should highlight the potential opportunities arising within the Portland Port area and other allocated employment sites that are located within the Port estate, for energy recovery uses.

The Port itself has extant planning consent for power generation and waste to energy infrastructure and this demonstrates the potential that already exists at the Port. If delivered, the generation of local power and heat at the Port is likely to support other more energy intensive businesses to Portland, which currently suffers grid capacity constraints. Furthermore, local power will support the inevitable roll-out of electric vehicles on the Island that may otherwise be curtailed given the cost of bringing more power to Portland.

Chapter 8 *‘Business and Employment’* recognises that Portland has tried to regenerate following the closure of the Ministry of Defence sites and highlights the potential of the former defence estate to accommodate new industrial and commercial activities. It states that whilst there has been some economic recovery since 2001, Portland’s economic underperformance continues to be a concern.

PPL believes that the neighbourhood plan should positively support the continued development of the Port, and its associated estate, to further stimulate job growth and deliver economic benefits for people living and working in Portland.

Paragraph 8.6 identifies sectors where the Portland Economic Plan aims to build on sectoral strengths, where there is potential for further growth. Paragraph 8.8 specifically identifies the potential for the development of renewable energy companies. PPL is surprised that these do not identify the potential for economic growth associated with low carbon energy generation from waste or waste to fuel, given that Policy Port/EN2 seeks to promote energy generation using renewable or low carbon sources. As set out above, PPL is concerned that the plan’s focus on renewable energy (tidal, wave, solar and wind) as a potential growth sector is too narrow and does not reflect the full potential for energy from waste and waste to fuel.

PPL proposes that paragraph 8.8 should refer to renewable and ‘low carbon’ energy, whilst also adding further text reference to Portland’s potential to accommodate energy recovery and waste to fuel as a means to securing low carbon energy.

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| | | <p>PPL generally supports Policy Port/BE2 (<i>Upgrading of Existing Employment Sites and Premises</i>), as it identifies potential for new investment to be made in Portland’s existing employment areas that will bring economic benefits to the area.</p> <p>PPL generally supports Policy Port/BE6 (<i>The Northern Arc</i>) as this recognises the importance of the Northern Arc and the need to realise the economic and employment potential of the area. Paragraph 8.21 specifically identifies Portland Port as part of the Northern Arc, which is expected to ‘cement’ the location as a vital employment zone for the benefit of local people and the economic wellbeing of the Island. This further supports PPL’s view that there are excellent opportunities for the development of the energy recovery and waste to fuel sector within the Port and the wider Northern Arc area that the neighbourhood plan should recognise and support.</p> |
| 20 | Portland Stone Quarry Trust | <p>Portland NP Consultation Statement June 2019 - Redacted. Page 3 - Foreword. Paragraph 4:</p> <p><i>“Over a period of five years, much research, several surveys, lots of consultation and considerable discussion has been led by a working group of local people.We are particularly grateful to everybody, whether individuals, organisations or businesses with an interest in Portland’s future that responded constructively to the consultations we have undertaken on the Plan. The many views and comments we received have been taken into account”.</i></p> <p>Portland Sculpture & Quarry Trust points have been omitted with comments and given presentations on proposals at meetings of the Portland Town Council Marine & Environment Committee, and have requested acknowledgement and inclusion in the Portland Neighbourhood Plan. However, there are a number of areas in the plan where the Trust’s projects, track record and achievements. We feel that this is a missed opportunity through not addressing cultural achievements of the Quarry Park and its future potential for economic growth linked to the cultural identity of the Island. There are cultural proposals omitted / excluded in the plan in preference to including large scale infrastructure, high budget schemes that may or may not be realised.</p> <p>Portland Sculpture & Quarry Trust has participated in the consultation for the Neighbourhood Plan through attending workshops and meetings , and has given presentations on its project proposals and on going cultural programme with the community for inclusion in the Portland Neighbourhood Plan but these details and projects have not been included.</p> <p>There are a number of areas stated in the plan that relate to quarries, their after use and restoration where the Trust’s track record of achievements has been omitted This includes the fact that the Trust has attracted over 60,000 long stay visitors and active participants over 36 years - providing interconnected cultural and education opportunities that celebrate Portland’s unique heritage, geology and wildlife.</p> <p>We feel that omitting the Trusts project plans /proposals below is a missed opportunity as they will to contribute to future cultural and economic growth as demonstrated throughout the Trusts 36 year track record;</p> |

1. Gateways and Entrances- The Memory Stones project is a new Gateway entrance to the interpretation of Tout Quarry and the wider Portland Quarries Nature Park that links important historical, ecological ,geological and cultural features to other organisations on the island.
2. Tout Quarry Sculpture Park & Nature Reserve and the wider Portland Quarries Nature Park - New work by professional artists creating a cultural route through contrasting quarry landscapes
3. The Drill Hall - Legacy project for a Living Land Archive - at the centre of the Quarry Park- within half a mile radius of 14 contrasting quarry environments connected by public footpaths.
4. Portland’s Amphitheatre - the regeneration of a neglected former quarry site located within map area LCA6 of the plan that becomes the destination for the Culture and Nature route along the East Weares.

The Portland Sculpture & Quarry Trust (UK Reg Charity 1086659) is listed as PSQT with incorrect contact details under Community Consultations List (2014), Appendix 10, Page 34 of the Portland NP Consultation Statement June 2019 - Redacted.

The Trust has not been consulted and its views have not been taken into consideration for:

Para 2.6 - Quarried Landscape: The Island’s heritage is its quarries. Each quarry carries a different geological, social and industrial history and they provide important open gaps between communities. There has been a cycle of quarrying, crushing, filling in and building. Open cast quarries can make an alternative positive contribution to the islands cultural heritage and World Heritage (with geological exposures of research interest, and accessible to the public - whereas the coastal geology is difficult to reach). The quarried landscapes also offer more land surface area, sheltered spaces from prevailing winds, micro climates and habitat creation for flora and fauna. Tout Quarry Sculpture Park & Nature Reserve, Kingbarrow Nature Reserve, Broadcroft Butterfly Conservation are all examples of how former open cast quarries have been successfully managed post closure.

Para 2.6 - Quarried Landscape: Concepts for the restoration and after-use of quarries were by led and developed by PSQT during the Mineral Industry Research Projects (MIST) 2002-2007 involving 34 Partners; This was funded through DEFRA with outcomes that informed Government Policy and quarry regeneration projects elsewhere in the UK. The MIST projects engaged over 2,000 people from the community in design workshops for the planning for closure, restoration and after-use of quarries in the North of the Island, in keeping with WPBC Local Plan policy TO9. This demonstrated a very large interest and active participation in the future concepts for the quarried landscape and innovation in how many areas might be brought into positive management and productive after-use.

In the Neighbourhood Plan Working Group Consultation Report August 2017 (no Page Numbers given) Weymouth & Portland Borough Council in Section 3: WPBC Comments on Portland Heritage and Character Assessment, that ‘...the report didn’t

really emphasise the importance of the openness and nature of conservation or celebrate the Portland Quarries Nature Park which is an exemplar project for GI management’.

We feel that although ‘development’ is identified in Para 7.34 as focusing on ‘industrial heritage on the island and the diverse high-quality landscape and biodiversity’ - there is still reluctance to acknowledge the above comment from WPBC re the Trusts work (36 yrs) that has successfully brought culture and nature together to build sustainable cultural tourism as a Brand for the Quarry Park. This acknowledgement is lacking in the plan.

Para 2.6 - Lack of Gateways: Memory Stones is a successful example of a gateway to the quarry park- with views across the island that connect the historical environmental, geological and cultural heritage through journeys into landscape. Since installation in 2017 the Memory Stones have been a constant attraction for visitors and, community dance performance and cultural use.

Page 6 - Right Hand Sidebar: - 'ratio of house process to income x8'. Typo - ‘prices’?

Para 2.8 - Map Illustration LCA 6 - Quarries and Open Spaces: Memory Stones, Tout Quarry Sculpture Park & Nature Reserve, The Drill Hall and Amphitheater all fall within Map Area LCA6. The projects are not mentioned in the associated paragraph 7.34.

Portland Map Book - Part 2 - Map13 Recreational Spaces:

Can the three recreational spaces listed below please be included in the listing.

- Memory Stones is omitted.
- Tout Quarry Sculpture Park & Nature Reserve is omitted. Planning permission granted Sculpture Park including 2 Workshop Areas.
- The Drill Hall is omitted and has a full planning permission 2003 as an Educational and Interpretation Centre for Arts, Heritage and Environment. The Drill Hall is Grade II Listed - Historic England UID: 1431761. And is one of the best 6 examples in the UK. There is a well documented history of community and recreational use - with building situated at the center of the Quarry Park, within half mile radius of 14 contrasting quarry environments in the North of the Island accessed by public footpaths).

Portland Map Book - Part 2 - Map16 Portland Tourist Trails: ‘ Immosthay Teut Gulley’. This should read as ‘Inmosthay Tout Gulley’, Correct typo.

Portland Map Book - Part 2 - Map16 Portland Tourist Trails: ‘Hardy Way West is shown as running along the Cliff Path on the edge of Tout Quarry Sculpture Park. The Cliff Path has been closed for 3 years and the public footpath / Cliff Path is diverted

through Tout Quarry Sculpture Park & Nature Reserve with signs in place. Can the correct route be shown on the map and highlighted in pink.

Portland Map Book - Part 2 - Map 16 Portland Tourist Trails: 'Theoretical connectiing route'. Correct Typo. Could it be explained what this term means?

Para 3.7.- Bullet Point 1. Activities that relate to cultural and heritage aspects of the island seem to be omitted from this point and need to be included.

Page 16 - PLAN OBJECTIVES _ COMMUNITY RECREATION: '...Protect and enhance local parks...'. Suggest adding publicly accessible former quarry environments, as a number have already had investment for improved access, stewardship, community leisure and recreation.

Para 7.5 - Please give the example of Tout Quarry Sculpture Park & Nature Reserve (TQSPNR) as the first quarry to establish a new after-use (1983). WPBC acknowledged Tout Quarry as an exemplary use of former quarry environment that has diversified visitor interest on the Island, provided activity for longer visitor stay, and has made a long term contribution to the local economy through sustainable tourism and educational initiatives '(including the first validated Higher Education courses in South and West Dorset).

Para 7.7 - 'Lano's Arch' is known as 'Lano's Bridge' . This is part of the former quarry railway in Tout Quarry along with the 'tipping bridges' on the edge of Tout Quarry.

Page 22 - Environment - Bullet Point 5: the term 'appropriate' needs to be deleted and does not represent a commitment to supporting the development plan for Portland Quarry Nature Park.

Our comment is made in support of previous request to delete 'appropriate' recorded in the Portland NP Consultation Statement June 2019_Redacted, Page 125, Comment 19. The Neighbourhood Plan response to Comment 19 states that no change can be made. Does this response negate the purpose of consultation if changes cannot be made?

Para 7.29 - The concept of a 'Portland Quarry Park' originated at the Trust's 10th Anniversary Seminar in 1994 entitled 'Looking Out from Tout ' and pre-dates 2012 Olympics. - The concept was further developed from 1999 onwards with regular meetings on Portland and at Weymouth & Portland Borough Council. For accuracy there should be recognition of the earlier date and source of the idea for a Quarry Park.

Map 7. - Quarries Nature Park. - Why is Tout Quarry sub-divided if the whole of Tout is already in the Quarry Park?

Map 7. Quarries Nature Park - The Portland Amphitheater is presently a neglected former quarry site with demolition waste and invasive plant species that has been developed through the community and youth groups working with architects towards a space that they would ultimately wish to perform in. The designs have received positive feedback from the many community consultations and PTC MET Committee bringing a positive cultural use, management and interpretation to the East Cliff. The site is situated adjacent to the South West Coast footpath, and as a destination within the Quarry Park - world class architecture and exposure of geology identified by 5 eminent Geo-scientists.

Para 7.46 - Delete repetition'are piers'.

Para 12.3 - Can a section be written into the Glossary of Terms for the NP that clearly states the distinction between the use of Green Spaces, Parks, Quarries and Recreational Spaces.

Para 12.5 - 'exiting ones'. Typo.

Map 13 - Recreation Spaces - Portland. The Drill Hall needs to be included.

The Drill Hall on Easton Lane has a very long history of community use with full disability access and Building Control permission for audiences of 214 people.

Policy No. PORT/CR5 - New Community Facilities Local youth organisations and groups have worked with architects to develop proposals for the amphitheater on East Cliff that will provide opportunities for their development, training and employment. Their presentations include the opening of the Community Stone Workspace at the Drill Hall (2013) PTC Marine Environment and Tourism Committee.(2017))and the Masonic Hall. (2017)

Para 13.12 - There is a substantial amount of tourist interest in the areas of cultural activities, environment and heritage. These not only bring economic benefits to the local community but also help to define 'the Brand'. These areas should be represented in this paragraph.

Para 13.12

Much of the islands biodiversity exists within the Quarry Park due to the pressures on land use. There is a real concern from the community about increased erosion due to the encouragement of activity holidays and adventure seekers. Please note comments made in a previous consultation statement Portland NP Consultation Statement June 2019_Redacted - page 129 comment 66 on policy TR4

Para 3.12 - "These activities will fit with the major projects as they develop' . It needs to be specified what major projects are identified and how outdoor sports will be reliant upon these? Climbing and mountain biking are having a negative impact on

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| | | <p>Portland's landscape and there is little evidence that they provide any real economic benefit. If this is promoted in the way that the Plan suggests the environment of the island might be seen to be at risk.</p> <p>Para 13.15 Could it be clarified if this paragraph is contradictory to Para 3.12 in which activity holidays and activity seekers are suggested to fit with 'major projects as they develop? Is it being proposed that there will be few sites with activity seekers attached to major projects - or will there be numerous sites across the island that can offer a rugged and rural location and if this is so, how will they be identified ?</p> <p>PAGE 74 PARA 13.23 Old Hill - - shouldn't 'conservation and improvement funding replace the term 'development funding'.? This path is extremely steep and would not be suitable for many people and emerges onto a dangerous bend on New Road adjacent to the former Council Offices .</p> <p>Please could PSQT be spelt out in the list of consultates ? There are a number of listed as consultees but with no contact details - could these be listed?</p> |
| 21 | V Pomeroy | <p>I believe the plan fails to capture any meaningful community engagement or connection with an Island culture. It is a wish list reliant on commercial financing with little regard for our Island culture. There is certainly no evidence of empowering the community. Where are the strategic objectives, those that underpin a plan? It is simply a wish list of isolated institutional organisations.</p> <p>The various authors are characterized by historical institutional arrangements, reinforcing, specific strategies on the part of existing influential organizations (financially benefiting) leaving the community powerless to participate or engage?</p> <p>Portland is currently trapped in a “low skill ’low pay” equilibrium, where low supply of skills is combined with a low demand for skills. This indicates a self -perpetuating desire to stifle improvement beyond that of institutional financial incentives.</p> <p>An example is the absence of the Portland Sculpture Trust. Over decades this locally based and funded self funded organisation only by donations, has engaged with schools, individuals and Artists and sculptors of International fame. You only need to examine the years of work the Sculpture trust has put in engaging with the community to provide the first Quarry Sculpture Park in the UK. A must visit experience for visitors. Where are their plans and their thirty years of toil to exist to preserve our Island values and culture? The report fails to capture any of the Sculpture Trusts input in championing the arts?</p> |

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| | | <p>Is it a repeat of the intuitions desire to rule and maintain self interest at the expense of the community who will co exist within a low skill low pay environment? Where are the consultations at the root of the people? At least show you care about these organizations and include their valuable input to the Islands economy.</p> |
| 22 | Dorset Council | <p>General Point - Maps</p> <p>We have previously raised concerns about the size and quality of the maps in earlier versions of the neighbourhood plan including: Map 2 - Character Areas on Portland; and Map 3: Portland Mineral Consultation Area. We welcome the production of larger-scale, high definition maps within the Map Book that accompanies the neighbourhood plan, which has addressed our earlier concerns.</p> <p>Chapter 3 – The Strategic Planning Context</p> <p>In paragraph 3.2 and footnote 3 a reference is made to the National Planning Policy Framework (NPPF), produced in March 2018. The paragraph / footnote should refer to the February 2019 NPPF, which is the latest version.</p> <p>Paragraph 3.10 refers to the West Dorset, Weymouth and Portland Local Plan Review. However, at a meeting on 25 June 2029 Dorset Council’s Cabinet agreed to no longer take this review forward – see http://do-modgov.wdwp.local/ieListDocuments.aspx?CId=152&MId=220&Ver=4. It was agreed that Dorset Council should “progress with a Dorset Council Local Plan ... with the aim of adopting the plan by April 2023.” It was also agreed that “the separate local plan reviews currently under way in the Dorset Council area, with the exception of the Purbeck plan which has reached examination, do not continue, but that all existing work carried out on these reviews be used where possible to shape the new Dorset Council Local Plan.” Since the work undertaken at ‘issues and options’ and ‘preferred options’ stages will be used to inform the new Dorset Council Local Plan, it is considered appropriate to refer to the approach to Portland that was being developed through the Local Plan Review. However, this needs to be discussed in the current context. This matter could be addressed by deleting the first sentence of paragraph 3.10, which states that the Local Plan Review is scheduled to be completed by 2019. The rest of the paragraph could be retained unchanged and a further paragraph could be added, explaining the current situation. A further paragraph could read “The West Dorset, Weymouth and Portland Local Plan Review is no longer being taken forward, but work has commenced on a new local plan for the Dorset Council area, which is scheduled to be adopted by April 2023. Dorset Council intends to use all work carried out on the Local Plan Review, where possible, to shape the new Dorset Council Local Plan.”</p> <p>Paragraphs 3.16 to 3.20 discuss safeguarding Portland’s minerals. Paragraph 3.17 refers to the emerging Minerals Sites Plan and Waste Plan and the publication of draft documents in December 2017. The Waste Plan has now been adopted by Dorset</p> |

Council and it is hoped that the Minerals Sites Plan will be adopted in autumn 2019. With that in mind, it may be appropriate to delete the penultimate sentence of paragraph 3.17 and replace it with the following wording: “The policies of the Neighbourhood Plan must be in general conformity with the Bournemouth, Dorset and Poole Minerals Strategy (2014), the Minerals Sites Plan (2019) and the Waste Plan (2019).”

Chapter 5: The Structure of Our Plan

This chapter discusses the issues of Strategic Environmental Assessment (SEA) and the need for a Habitats Regulations Assessment (HRA). Paragraph 5.13 specifically refers to the need for an overarching policy in the Neighbourhood plan to protect European sites and points out that Policy Port/EN0 was included to address this point. However, following the submission of the Neighbourhood Plan, Natural England sought a different form of wording for Policy Port/EN0. An exchange of e-mail correspondence, which is online here - <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/neighbourhood-planning/pdfs/neighbourhood-plan/portland/confirmation-email-from-npg-to-accept-changes-redacted.pdf> confirms that the amended form of wording sought by Natural England would be acceptable to the Neighbourhood Plan Group. Details of the change of wording sought are set out later in this response.

Paragraph 5.14 discusses other changes sought to policies EN5, EN8 and BE6 in the original HRA report and re-iterated in the HRA addendum. For completeness this paragraph may also wish to reference the change sought to Policy ST1 which is currently not mentioned.

Port/EN0 – Protection of European Sites

The policy in the submitted Neighbourhood Plan should be deleted and replaced with the wording recommended in the HRA addendum, which is “*Proposals that will adversely affect the integrity of European sites will not be supported. Any development brought forward regarding the Northern Arc or enhancement of the piers must ensure that it can be implemented without any adverse effect upon the integrity of the European sites*”.

Port/EN2 – Renewable Energy Development

Part of Policy Port/EN2 says “Proposals for wind farms and wind turbines of an appropriate scale and in accordance with the policies of the Development Plan will be supported.” However, as a matter of fact no areas are identified as being suitable for wind farms or wind turbines in the Local Plan or the submitted Neighbourhood Plan. In the light of this situation, it may be appropriate to delete this part of the policy.

The rationale for including this wording was as a way of seeking to ‘future-proof’, the neighbourhood plan given the emergence of the West Dorset, Weymouth & Portland Local Plan Review and the intention to include a new policy to deal specifically with wind energy development. Draft Policy COM11 in the Preferred Options Consultation Document did not identify any suitable sites, but did promote small scale schemes, where the hub of any turbine would be a maximum of 15 metres.

Circumstances have changed following local government re-organisation and on 25 June 2019, Dorset Council’s Cabinet agreed to focus work on a single local plan for Dorset and not to take forward the West Dorset, Weymouth & Portland Local Plan Review. It is unclear what approach the Dorset Local Plan will take towards wind energy and there is no certainty that draft Policy COM11 will be taken forward. In the light of these changes in circumstances, it may be appropriate to also amend the text in paragraphs 7.26 and 7.27.

It is suggested that paragraph 7.26 could be deleted and replaced with “National planning policy asserts that applications for wind energy development will only be allowed if the development site is identified as suitable for wind energy in either a Local or Neighbourhood Plan. We shall work with the local planning authority as it prepares the Dorset Local Plan to consider whether there are suitable locations and a way of harnessing wind energy satisfactorily on a commercial-scale on Portland.” It is also suggested that the first sentence of paragraph 7.27 should be deleted.

Port/EN3 – Portland Quarries Nature Park

The wording of this policy has changed through the preparation of the neighbourhood plan and the changes seem to reflect the comments made by the former Weymouth and Portland Borough Council and other respondents. It is helpful that it is now clear that Policy Port/EN3 relates to the ‘aspirational areas’, as well as the allocated areas.

Though generally supportive of the aims of this policy we would resist the sterilisation of safeguarded mineral resources in accordance with Policies SG1 and SG3 of the Minerals Strategy. The addition of criteria vi protecting safeguarded Portland Stone reserves is welcomed. It is recognised that some suggested wording regarding mineral safeguarding has been incorporated into the supporting text of Policy Port/EN3. However, we would like to see this section of the plan providing further protection to mineral resources. We recommend that the text should go on to state that that the remaining resource (at Broadcroft) is not unnecessarily sterilised. The aspiration for the area to form part of the nature park is agreed with. However, this should be a longer term aim and proposals should not compromise the extraction of safeguarded stone.

A couple of minor corrections are required. Paragraph 7.35 should refer to ‘Policy Port/EN3’, rather than ‘Policy Port/EN4’. Paragraph 7.36 should refer to ‘Dorset Council’ rather than ‘Dorset County Council’.

Port/EN4 – Local Heritage Assets

One minor correction is required. Paragraph 7.39 should refer to ‘Policy Port/EN4’, rather than ‘Policy Port/EN5’.

Port/EN5 – Historic Piers

The HRA picked up the potential for impacts on internationally important wildlife sites, recommending the policy be amended to ensure that no adverse effects on the integrity of European sites occurs as a result of water pollution stemming from site runoff or dust emissions during construction or the operational stage of each of the developments. In response Policy Port/EN5 has been modified to require “Any development proposals brought forward regarding the enhancement of the piers for social or economic use must ensure that they can be implemented without any adverse effect upon the integrity of the European sites. Proposals that will adversely affect the integrity of European sites will not be supported”. Further clarification is provided at paragraph 7.46.

Additional text recognising the security concerns of Portland Port is welcomed.

We have previously sought evidence on the feasibility and viability of the re-use of the piers and have asked whether this could be provided prior to the submission of the neighbourhood plan. At submission, it does not appear that this aspirational policy is supported by feasibility / viability evidence. As the changes to the wording of the policy now address many of the potential conflicts, there is no objection to this policy, although there remains uncertainty about its deliverability.

Port/EN6 – Defined Development Boundaries

It is noted that many of the Defined Development Boundaries (DDBs) shown on Map 8 are unchanged from those in the adopted local plan. The main changes include are:

- The removal of the DDBs from some employment sites within Portland Port (although the DDB around the main port area and Castletown has been retained);
- The removal of the DDBs from employment areas in the quarried landscapes between Fortuneswell and Easton; and
- The removal of the DDB from the Old Coastguard Cottages at Portland Bill.

It is the case that the adopted local plan allows neighbourhood plans to amend DDBs, and it is considered that the changes proposed will provide a more appropriate framework in the development plan for the determination of planning applications.

Paragraph 7.52 makes it clear that the employment sites within Portland Port would remain ‘key employment sites’ despite the removal of their DDBs, effectively making them employment sites in the countryside. It is considered that this approach is entirely appropriate, as it is one which has been applied elsewhere in the local plan area. For example Pymore Mills at Bridport is also a ‘key employment site’ without a DDB. This approach is also considered to be more appropriate given the proximity of wildlife sites, including those of international importance. Employment uses could be compatible with wildlife interests; more so than other urban uses that may be permitted within DDBs.

The removal of the DDBs around the employment sites between Fortuneswell and Easton is also considered to provide a more appropriate policy framework than exists in the current local plan. Although this landscape has been considerably modified by quarrying, much of it now lies within the Portland Quarries Nature Park, which seeks the restoration of the area. It is therefore more appropriate to treat these areas as employment sites in the countryside, rather than as discrete built-up areas within DDBs with employment uses.

The Old Coastguard Cottages are located within the ‘Portland Bill and The Jurassic Coast Landscape Character Area’ (LCA6), as defined in the Portland Heritage and Character Assessment 2017. It is considered more appropriate for these cottages to be ‘washed over’ by the countryside than for them to be defined as a built-up area within a DDB.

It seems unlikely that the removal of DDBs around employment sites within Portland Port and between Fortuneswell and Easton would affect the ability of the Port (and any other existing employment uses) to develop economically, as the ‘key employment site’ designation would still permit employment uses.

Port/EN7 – Design and Character

Policy Port/EN7 includes some elements of a number of design policies from Chapter 2 of the local plan, but excludes others. The generic design issues addressed in the local plan, which do not appear to be addressed in Policy Port/EN7 include: the retention of trees and other features that enhance local character (see Local Plan Policy ENV10 (ii) and (iv)); and layout and permeability issues (see Local Plan Policy ENV11). To ensure that these matters are not overlooked when planning applications on Portland are determined, it would be helpful to add a cross-reference to the design policies in the local plan in the supporting text.

Port/EN8 – The Verne

The main concern with this policy as originally drafted was that the supporting text sought to resist residential development, even though the buildings at The Verne have previously been in residential use. It is considered that the amended wording in

the submitted plan overcomes those concerns as it recognises that residential re-use may be appropriate, but also that the type of residential re-use that may be permitted needs to have regard to the very unusual and isolated location of the site.

The HRA picked up the potential for impacts on internationally important wildlife sites and the additional wording recommended by the HRA is welcomed.

Port/BE1 – Protecting Existing Business Sites and Premises

The ‘key employment sites’ shown on Map 10 appear to be consistent with the ‘key employment sites’ shown on the Local Plan’s policies map (with some boundary changes) with the exception of the addition of the Albion (Stone Works) Area. This is currently shown on the Local Plan policies map as an area within a DDB but without the ‘key employment site’ notation. There is no objection to the principle of identifying this area as a ‘key employment site’ in the countryside (by virtue of the proposed removal of the DDB). It is considered that this would provide a more appropriate policy framework for determining planning applications in this area, which would be more compatible with the proposals for the Portland Quarries Nature Park on adjoining land. The main occupier is the Albion Stone Factory, together with a few other workshop buildings. The role of the factory in processing, sawing and finishing Portland Stone appears to be compatible with proposed policy change, which would make the site subject to Policy ECON2 in the Local Plan.

Port/BE5 – Facilitating Home Working

The changes to earlier drafts of this policy to clarify its primary purpose (which is to encourage home-working activity ancillary to the main residential use) are welcomed. It is noted that this is very similar to Policy FM14 on Page 43 of the Fontmell Magna Neighbourhood Plan, which has passed examination – see this link to the submission plan - <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/fontmell/submission/fontmell-magna-neighbourhood-plan-submission-draft-march-2018.pdf>.

Port/BE6 – The Northern Arc

Concerns have previously been raised about the narrow focus of earlier drafts of Policy Port/BE5 on realising the economic and employment potential of the Northern Arc area. We welcome the cross references in paragraph 8.23 recognising the broader range of uses envisaged in Local Plan policies that cover different parts of this area, notably PORT1: Osprey Quay (mixed use) and PORT2: Former Hardy Complex (housing).

The HRA picked up the potential for impacts on internationally important wildlife sites and the additional wording recommended by the HRA is welcomed. It is also welcomed that the policy not only seeks to realise the economic and employment potential of the area, but also aims to improve the environmental quality of the area.

The changes to earlier drafts of Policy Port/BE6 are welcomed. The future development of this area could be approached in different ways, which still need to be worked out and not necessarily through a ‘master planning’ approach. Use of the term ‘strategic planning’ is welcomed as this is less prescriptive and provides greater flexibility with regard to future approaches. Explicit confirmation that this approach has the support of Portland Port in paragraph 8.21 is also welcomed.

Port/HS1 – Housing Mix and Amenity

The policy seeks ‘an appropriate mixture of house types’ on sites over a certain size and requires a judgement to be made about whether a mix proposed by a developer on a specific site would meet the ‘current local housing needs of the neighbourhood area’. Paragraph 9.10 indicates that this should be done by referring to ‘an up-to-date assessment of the local housing market and needs’, which should have been produced no more than 12 months prior to the application being submitted. Prior to local government re-organisation, any report produced by Weymouth & Portland Borough Council on housing need would look at the needs in the borough (although not necessarily the specific needs of Portland). Following local government re-organisation, it has been decided to concentrate on producing a single local plan for the Dorset Council area, which will inevitably take a more strategic overview of the size and types of housing required. It is unlikely that the evidence to support this local plan would examine separately the housing needs on Portland.

Paragraph 9.10 indicates that ‘Portland Town Council will endeavour to maintain up-to-date intelligence on local housing need’, but in order for the evidence to be ‘up-to-date’ (as defined in paragraph 9.10), any such assessment would need to be carried out at least annually. Dorset Council will not be undertaking Dorset-wide housing need assessments this frequently and it seems it would also be an onerous task for the town council to assess housing needs on Portland on an annual (or more frequent) basis. This raises the question of how the appropriateness of the housing mix on any specific site would be judged in the absence of an ‘up-to-date’ assessment of local need (i.e. less than 12 months old). On one hand, it might be argued that an assessment that is more than a year old should still be considered to be an acceptable benchmark to judge the appropriateness of the housing mix on a particular site. On the other hand, it might be argued that such an assessment should not be used as a benchmark, because it is (as defined by the neighbourhood plan itself) out-of-date.

Perhaps this difficulty could be overcome by introducing a degree of flexibility into the policy framework. For example, perhaps the neighbourhood plan should say that the most recent assessment of local housing need should be used as the ‘starting point’ for judging the acceptability of the housing mix on any specific site, but in making any judgement on this

matter, consideration should also be given to: whether the assessment remained relevant; and whether there were any particular strategic or local circumstances that may justify a different housing mix.

A Strategic Housing Market Assessment was undertaken to inform the currently adopted Local Plan in 2014. Section 4 looks at the future housing requirement for West Dorset District and Weymouth & Portland Borough. Tables 4.7 and 4.8 indicate the type of mix required across the Borough for owner-occupied and private rented accommodation - see <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/evidence-base/pdfs/sustainability/west-dorset-weymouth-and-portland-2014-strategic-housing-market-report-part-2.pdf>. This report does not give a breakdown of the mix required specifically for Portland and is now 5 years old, highlighting the need for an up-to-date, Portland-specific assessment if the policy, as currently drafted, is to be applied effectively.

Port/HS2 – Community Housing Assets

The supporting text to Policy HOU2 in the Local Plan (paragraph 5.2.11) enables local communities to allow market housing cross-subsidy on exception sites where this is brought forward through neighbourhood planning. Paragraph 9.15 of the Neighbourhood Plan allows a ‘small proportion of open market housing’ on exceptions sites. Whilst this approach is consistent with the local plan, greater clarity is required on how this would operate.

Paragraph 9.15 does not define what a ‘small proportion’ is, but states that it would only be permissible where the number of market homes would be ‘appropriate to make the overall development viable and sustainable’. The lack of clarity raises a number of questions. What percentage of market homes would constitute a ‘small proportion’: would this be 10%, 20%, 30% or higher? Also how should a proposal be determined if it could only be made viable with a ‘large proportion’ of market homes, perhaps 40% or 50%? The lack of clarity means that it is not clear how the ‘test’ set out in paragraph 9.15 should be applied. If paragraph 9.15 is meant to be a test against which the acceptability of development proposals will be assessed, then it should be included in Policy Port/HS2, rather than in the supporting text.

The text relating to a proportion of ‘open market housing’ is inconsistent with some of the criteria in Policy Port/HS2. Criterion iii f requires local occupancy and principal residency clauses to be in place for all affordable dwellings. This implies that there would not be a requirement for such clauses for any market housing element. However, the final sentence of paragraph 9.16 states that ‘priority for the open market housing should be given to purchasers with a local connection who are seeking a permanent local residence. It is difficult to see how this could be achieved without the inclusion of clauses to address these matters in planning agreements. More fundamentally, it is questionable whether a dwelling which is subject to local occupancy / principal residency restrictions could reasonably be considered to be ‘open market housing’.

Criterion iii g states that any land on an affordable housing exception site should be held in trust as a community asset. It is not clear how any open market element would meet this criterion. Criterion iii h states that the dwellings on an affordable housing exception site should ‘remain affordable’. It is not clear how any open market element would meet this criterion.

Port/HS3 – Second Homes

Census data – see Table 1 at this link -

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/2011censussecondaddresssestimatesforlocalauthoritiesinenglandandwales> - indicates that in 2011 3.9% of properties in Weymouth & Portland and 6.7% of properties in West Dorset were second homes. Paragraph 9.17 of the neighbourhood plan indicates that only 3.4% of properties on Portland were second homes in 2011. This raises the question of whether a second homes policy for Portland is needed or justified.

Consideration needs to be given to whether it would be reasonable to apply this policy to replacement dwellings. There may be existing second homes on Portland where the owner decides to demolish and replace their house. In such circumstances, Policy Port/HS3 would prevent the existing owner from living in the replacement dwelling. In that respect, the policy would seem to be unduly restrictive and may have human rights implications.

Paragraph 9.20 refers to the legal challenge in relation to the St Ives Neighbourhood Plan and whilst it is accepted that, in principle, a second home policy can be included in a neighbourhood plan, the circumstances in St Ives are very different. In 2011 25% of dwellings in the St Ives Neighbourhood Plan Area were second homes, compared to just 3.4% on Portland. It was also shown that despite a 16% growth in housing stock between 2001 and 2011, the number of resident households in St Ives grew by less than 6%. The supporting text to Policy Port/HS3 includes some evidence about pressures for second homes more recently, but this does not seem to be sufficient to justify the policy.

There does not seem to be any evidence on the impact the ‘principal residence’ restriction could have on the local housing market (for example impacts on demand, house prices and viability), which may be a concern given the lower house prices and the reduced proportion of affordable housing sought on Portland (i.e. 25% as opposed to 35% in Weymouth and West Dorset). There also does not seem to be any evidence of the impact the restriction may have on tourism, as in some cases second homes may also be used as tourist accommodation. Further evidence is required to demonstrate that this policy would contribute to sustainable development. In the absence of such evidence, the policy should be deleted.

Paragraph 9.19 refers to ‘hotspots’ of second home ownership on Portland and that this is likely to become more of a problem in the future. As a result, it is proposed to only apply such a restriction ‘whenever it is deemed appropriate by the

Local Planning Authority, after consultation with the Town Council’. Whilst it is recognised that this is an attempt to develop a more flexible and pragmatic approach to the issue, there are a number of problems with it.

The policy does not give developers certainty about whether such a restriction will, or will not, be applied, which could have implications for the viability of schemes. There is also concern that the approach would require the application of each principal residence condition to be justified on a case-by-case basis by the Local Planning Authority. This would be likely to require the constant updating of evidence relating to the level of second homes and holiday lets on Portland, in order for the council to be able to take a view on whether or not to apply such a condition in each case. This is an unduly onerous burden for the council and the approach should be to gather the evidence needed to justify the policy as part of the preparation of the Neighbourhood Plan.

Paragraph 9.21 requires the occupant of a home with a principal residence restriction to provide evidence of that restriction to the local planning authority within 14 days of a written request to do so. In the event that Policy Port/HS3 is retained in the final neighbourhood plan, the council would wish to give further consideration to how verification of compliance with any condition / agreement would be achieved. In particular, it may be appropriate to allow more than 14 days for documentation to be returned to the council, especially if any such request is being sent to a property that is only occupied periodically.

Port/HS4 – The Hardy Complex

Policy Port/HS4 supports proposals that would reduce the mass and visual impact of the Hardy Block. However, any such proposals could potentially reduce the amount of housing delivered on the site, undermining the strategic policies of the Local Plan. The extant planning permission for the Hardy Block remains part of the housing supply. If the effect of Policy Port/HS4 would be that the Neighbourhood Plan promoted less development than set out in the Local Plan, this would be contrary to paragraph 29 of the 2019 NPPF.

Port/TR3 – Reducing Parking Problems

This policy should refer to ‘Dorset Council’ rather than to ‘Weymouth & Portland Borough Council’.

Port/SS1 – Reinforcing Local and Neighbourhood Centres

The distinction drawn between ‘local’ and ‘neighbourhood’ centres in this policy is welcomed. The local centres (as defined in the Local Plan and Local Plan Review and supported by retail study evidence) are Easton and Fortuneswell and the neighbourhood centres (as defined by the Neighbourhood Plan) are Castletown and Chiswell.

It is appropriate for Policy Port/SS1 to protect the two ‘local centres’ from ‘out-of-centre’ developments in accordance with Policy ECON4 of the Local Plan (which includes a sequential test). It would not be appropriate to protect the two ‘neighbourhood centres’ in the same way, as they were not defined as ‘local centres’ in recent retail study work. However, it is entirely appropriate for these two areas to be subject to a more locally-based policy, as is the case with parts of Policy Port/SS1.

It does not appear that the supporting text in paragraphs 11.5 to 11.8 has been updated to distinguish between ‘local’ and ‘neighbourhood’ centres. The text in paragraph 11.5 indicating that Easton ‘should be regarded as a district centre’ is unhelpful and should be deleted, as this assertion is not supported by the council’s recently published joint retail and commercial leisure study (March 2018) <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/evidence/joint-retail-study.aspx>, which defines it as a local centre.

For Easton, the study provided the basis for defining: a town centre boundary; primary and secondary shopping frontages; and a primary shopping area in the Preferred Options Consultation Document for the Local Plan Review. The Preferred Options also included a proposed local centre boundary for Fortuneswell – see <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/local-plan-review/pdfs/north-dorset-local-plan-review/evidence-base/appendices-volume-i-v2-d-reduced.pdf>. The designations proposed in the Preferred Options Consultation Document are different to those put forward in the neighbourhood plan. The proposed designations in the Preferred Options Consultation Document are considered to be evidence-based, but it is not clear what evidence sits behind the boundaries proposed in the neighbourhood plan. Unless those boundaries can be justified, it is considered that those put forward in the Preferred Options Consultation Document should be used in the neighbourhood plan.

As the neighbourhood centres at Castletown and Chiswell do not form part of the hierarchy of centres identified in the Local Plan and Local Plan Review, the definition of their boundaries is entirely a matter for the Neighbourhood Plan.

Port/CR1 – Protecting Recreation Spaces

Weston Road Recreation Ground is now leased to Portland Town Council (Dorset Council having retained the freehold) who are restricted to continuing use as a playing field. In this respect this site is afforded protection and identification under Policy Port/CR1 appears unnecessary.

Royal Manor Playing Field/Tennis Court is owned by Homes England who intend to develop residential uses. The Plan should acknowledge the site is unlikely to remain as it is now. Accordingly it should not be included under Policy Port/CR1.

Port/CR3 – Allotments

Paragraph 12.17 states that the allotments south of Grove Road are owned and managed by Weymouth & Portland Borough Council. This council ceased to exist in April 2019. The allotments are either owned by Dorset Council or perhaps have been transferred to Portland Town Council. This text should be updated to reflect the current situation.

Port/ST1 – Sustainable Tourism Development

The HRA picked up the potential for impacts on internationally important wildlife sites and the inclusion of the specific qualification recommended by the HRA is welcomed.

Glossary

The definition of ‘Local Education Authority’ refers to ‘Dorset County Council’, which no longer exists. ‘Dorset County Council’ should be deleted and replaced with ‘Dorset Council’.

The definition of ‘Local Plan’ reflects the collection of documents that make up a Local Development Framework, rather than a local plan. It may be more appropriate to use the full definition of a local plan in the NPPF (or just the first sentence), which is: ‘a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.’

The definition of ‘Local Planning Authority’ refers to ‘West Dorset, Weymouth and Portland District Council.’ West Dorset District Council and Weymouth & Portland Borough Council no longer exist. ‘West Dorset, Weymouth and Portland District Council’ should be deleted and replaced with ‘Dorset Council’.

Under the definition of ‘Minerals Plan’, ‘Dorset CC’ should be deleted and replaced with ‘Dorset Council’.

‘Principle Residence’ should read ‘Principal Residence’.

The definition of ‘Scheduled Monument’ refers to any monument which ‘for the time being’ is included in the schedule. This seems to imply that inclusion of any monument on the schedule (at least on Portland) is temporary. It is not clear why this implication is being made, which may be misleading. It may be more appropriate to use Historic England’s definition which is: ‘A scheduled monument is an historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Digital, Culture, Media and Sport.’

Under the definition of ‘Waste Plan’, ‘Dorset CC’ should be deleted and replaced with ‘Dorset Council’.

Late

| Rep ID | Respondent | Summary |
|--------|---|--|
| 23 | Laura Baldwin | <p>Given the declaration of climate emergency this year by the UK government, Dorset Council and Portland Town Council, I would urge the next review of the Portland Neighbourhood Plan to add a new para, after 7.11.</p> <p>Environment: ‘Dorset and Portland Town Councils 2019 declarations of Climate Emergency mean that Portland needs to play its part in protecting not only the immediate environment that is the Isle of Portland but also the wider planetary environment. This is to be achieved by a) protecting and enhancing the Island’s biodiversity, and b) moving rapidly toward a low carbon economy. This latter objective should inform all the other objectives: new and existing businesses need to de-carbonise both their direct and indirect energy consumption, the generation of renewable energy is to be encouraged, new housing must be energy efficient above and beyond Building Standards and ways to help householders retrofit existing buildings need to be found, transport has to be de-carbonised, and tourism needs to develop in ways that reduce rather than increase private car use.’</p> |
| 24 | Office of the Police & Crime Commissioner | <p>Martyn Underhill, Dorset Police & Crime Commissioner, wished to raise the following key concerns regarding the Portland Neighbourhood Plan:</p> <p>That despite references within the Plan to the social deprivation issues experienced on Portland this doesn’t feature as one of the overarching aims; and</p> <p>There also appear to be no references to crime, policing, community safety or Anti-Social Behaviour (ASB) within the Plan and how these might feature in contributing towards the achievement of the key aims identified.</p> |